

**Defendants' Objections to Plaintiff's Exhibit
List
EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

RUTH SMITH, Individually and as Widow for the)	
Use and Benefit of Herself and the Next Kin of)	
Richard Smith, Deceased,)	
)	
Plaintiff,)	Civil No. 3:05-0444
)	Judge Aleta A. Trauger
v.)	(Dist. Of MA No.
)	1:05-cv-11515PBS)
PFIZER, INC., <i>et al.</i> ,)	
)	
Defendants.)	

DEFENDANTS' OBJECTIONS TO PLAINTIFF'S PROPOSED TRIAL EXHIBITS

Pursuant to the agreement of the parties, Defendants, Pfizer Inc and Warner-Lambert Company LLC (collectively, "Defendants" or "Pfizer") have set out herein their objections to the exhibits identified in Plaintiff's Revised Trial Exhibit List served on April 20, 2010. Defendants anticipate the need to assert additional objections depending upon the evidence presented by Plaintiff, the Court's evidentiary rulings, and/or other matters that may arise before or at trial. Accordingly, Defendants respectfully and specifically reserve the right to: (1) withdraw at any time any objections identified; (2) supplement and/or amend their objections in response to the Court's rulings on pretrial motions or other evidentiary matters; (3) supplemental and/or amend their objections in response to Plaintiff's intended and/or actual use of the exhibits; and (4) supplement and/or amend their objections as otherwise permitted by the Court, even when Defendants presently identify that they have "No Objection" to the proposed exhibits.

DEFENDANTS' OBJECTIONS

Defendants assert the following objections to Plaintiff's exhibits as identified by exhibit number:

Authenticity: A document is inadmissible if it is not what the proponent claims it to be. Fed. R. Evid. 901. In addition, pursuant to Rule 36(a)(2) of the Federal Rules of Civil Procedure, a document must be provided with a request for admission "or ha[ve] been otherwise furnished or made available for inspection and copying." Fed. R. Civ. P. 36(a)(2).

Foundation: Out-of-court statements offered for their truth are hearsay not subject to any exception if they are made beyond the scope of a person's regular duties. *See* Fed. R. Evid. 802, 803(6); *see also Redken Labs., Inc. v. Levin*, 843 F.2d 226, 229 (6th Cir. 1988). Also, a non-expert witness may not testify in the form of opinions or inferences beyond those opinions or inferences rationally based on the perception of the witness. *See* Fed. R. Evid. 701.

Hearsay: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted. Fed. R. Evid. 801, 802; *see also Rush v. Ill. Cent. R.R.*, 399 F.3d 705, 719 (6th Cir. 2005).

Hearsay-within-hearsay: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted and is hearsay-within-hearsay when those statements themselves contain out-of-court statements offered for the truth of the matter asserted. Each level of hearsay-within-hearsay is inadmissible absent some exception specific to each level. Fed. R. Evid. 805; *see also Smith v. Highland Park Ruritan Club*, No. 3:06-CV-351, 2008 WL 2669107, at *4 (E.D. Tenn. June 27, 2008).

Non-final agency finding: Evidence is inadmissible if it consists of an out-of-court statement offered for the truth of the matter asserted, even when those statements are made by

public agencies. Non-final, interim, or draft findings, or personal or other statements not made pursuant to agency authority do not fall under the public record exception to the hearsay rule and are, therefore, inadmissible. *See Toole v. McClintock*, 999 F.2d 1430, 1434-35 (11th Cir. 1993); *City of New York v. Pullman Inc.*, 662 F.2d 910, 915 (2d Cir. 1981) (quoting *United States v. Fosher*, 590 F.2d 381, 383 (1st Cir. 1979)).

Irrelevant: Irrelevant evidence is inadmissible. Fed. R. Evid. 402. Irrelevant evidence does not “tend[] to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” Fed. R. Evid. 401; *see also United States v. Blackwell*, 459 F.3d 739, 769 (6th Cir. 2006).

Irrelevant: Marketing, advertising, and publications (including other indications):

To the extent that Plaintiff has identified an exhibit to purportedly support allegations of improper marketing, including publications on gabapentin and documents regarding other indications other than the indication for which Decedent was prescribed Neurontin, such exhibit is irrelevant and inadmissible under Rules 401 and 402, the MDL court’s May 26, 2009 Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent’s prescribers or their prescribing decision. (*See* Mem. & Order [1790] at 34, May 26, 2009); *see also In re Seroquel Prods. Liab. Litig.*, No. 06-MD-1769-Orl-22DAB, 2009 WL 223140, at *4-5 (M.D. Fla. Jan. 30, 2009); *Miller v. Pfizer, Inc.*, 196 F. Supp. 2d 1095, 1122-23 (D. Kan. 2002); *Alexander v. Smith & Nephew, P.L.C.*, 90 F. Supp. 2d 1225, 1235 (N.D. Okla. 2000); *In re Norplant Contraceptive Prods. Liab. Litig.*, No. MDL 1038, 1997 WL 81092, at *1 (E.D. Tex. Feb. 21, 1997).

Irrelevant: Other events: Reports of other events – *i.e.*, use of medications other than Neurontin, adverse event reports with medications other than Neurontin, and/or events other than Decedent's – lack substantial similarity to this case, and are, therefore, inadmissible as evidence of other incidents or accidents pursuant to Rules 401-404. *See Engebretsen v. Fairchild Aircraft Corp.*, 21 F.3d 721, 732-33 (6th Cir. 1994); *Rye v. Black & Decker Mfg. Co.*, 889 F.2d 100, 102-03 (6th Cir. 1989); *Pride v. Bic Corp.*, 54 F. Supp. 2d 757, 760 (E.D. Tenn. 1998) ; *Soldo v. Sandoz Pharms. Corp.*, 244 F.Supp.2d 434, 550–551 (W.D. Pa. 2003); *Wolf v. Proctor & Gamble Co.*, 555 F. Supp. 613, 622 (D.N.J. 1982).

Irrelevant: The Franklin litigation and other claims or actions: Evidence from the *Franklin* litigation and other claims, actions, or legal proceedings are inadmissible because they have no tendency to make more or less probable the existence of any fact of consequence. *See, e.g., McLeod v. Parsons Corp.*, 73 F. App'x 846, 853-54 (6th Cir. 2003); *CPC Int'l v. Northbrook Excess & Surplus Ins. Co.*, 144 F.3d 35, 45 (1st Cir. 1998); *Kinan v. City of Brockton*, 876 F.2d 1029, 1034-35 (1st Cir. 1989); *Barnes v. Koppers, Inc.*, No. 3:03CV60-P-D, 2006 WL 940279, at *3 (N.D. Miss. Apr. 11, 2006). In addition to being inadmissible under Rules 401 and 402, such exhibit is inadmissible under the MDL court's Fraud Order, and the facts of this case because there is no evidence connecting the exhibit to Decedent's prescribers or their prescribing decision.

Irrelevant: Criminal plea: Evidence of the criminal plea is properly excluded because it does not make the existence of a fact of consequence more or less probable. (*See* 5/13/09 Mem. & Order [1780] at 37-38); *see also In re Neurontin Mktg. & Sales Practices Litig.*, 244 F.R.D. 89, 92 n.6 (D. Mass 2007). In addition to being inadmissible under Rules 401 and 402, this exhibit is inadmissible under the MDL court's Fraud Order, and the facts of this case

because there is no evidence connecting the exhibit to Decedent's prescribers or their prescribing decision.

Irrelevant: New warning: Under Rule 407, measures taken after an injury or harm allegedly caused by an event, that if taken previously, would have made the injury or harm less likely to occur, are not admissible to prove negligence, culpable conduct, a defect in a product, a defect in a product's design, or a need for a warning or instruction. Fed. R. Evid. 407. Thus, Neurontin's new warning label and patient information guides are inadmissible to show liability under Rule 407. *See Stahl v. Novartis Pharms. Corp.*, 283 F.3d 254, 270 n.10 (5th Cir. 2002); *Lindsay v. Ortho Pharm. Corp.*, 637 F.2d 87, 94 (2d Cir. 1980); *Werner v. Upjohn Co.*, 628 F.2d 848, 854 (4th Cir. 1980); *see also Gray v. Hoffman-La Roche, Inc.*, 82 F. App'x 639, 646 (10th Cir. 2003).

Rule of completeness: When a writing or recorded statement or part thereof is introduced by a party, an adverse party may require the introduction at that time of any other part or any other writing or recorded statement which ought in fairness to be considered contemporaneously with it. Fed. R. Evid. 106; *see also United States v. Holden*, 557 F.3d 698 (6th Cir. 2009).

Probative value substantially outweighed: To the extent the Court determines that an exhibit objected to by Defendants on any relevancy ground is admissible, the exhibit should still be excluded under Rule 403 because its probative value, if any, is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence. Fed. R. Evid. 403; *see Old Chief v. United States*, 519 U.S. 172, 180 (1997); *Schrand v. Fed. Pac. Elec. Co.*, 851 F.2d 152, 156 (6th Cir. 1988).

Impermissible character evidence: To the extent plaintiff has identified an exhibit to purportedly show Defendants acted in conformity therewith or to show Defendants “propensity,” such exhibit is inadmissible under Federal Rule of Evidence 404(b). *See McLeod v. Parsons Corp.*, 73 F. App’x 846, 854 (6th Cir. 2003); *Fisher v. Am. Gen. Fin. Co.*, 52 F. App’x 601, 606 07 & n.3 (4th Cir. 2002) (per curiam); *Jankins v. TDC Mgmt. Corp., Inc.*, 21 F.3d 436, 441 (D.C. Cir. 1994); *Crawford v. Yellow Cab Co.*, 572 F. Supp. 1205, 1208-09 (N.D. Ill. 1983).

Missing: To the extent that plaintiff did not provide a copy of their proposed exhibit, Defendants reserve all objections.

INCORPORATION OF DEFENDANTS’ MOTIONS IN LIMINE

Defendants incorporate herein the following motions *in limine*, and object to any exhibit on these grounds, based on their requests that the Court enter an Order excluding:

1. The guilty plea dated May 13, 2004; any negotiation, settlement, or agreement between Pfizer and/or Warner-Lambert with any government entity arising out of the guilty plea; or any related government finding or investigation of marketing of Neurontin in violation of the Food, Drug, and Cosmetic Act, and the fact of any such investigation.
2. Evidence offered by Plaintiff to show allegedly improper marketing or other conduct, including any marketing, advertising, or promotional materials or conduct concerning Neurontin (whether for off-label use or otherwise), including but not limited to, evidence of promotion, studies, letters from DDMAC, publications, testimony of sales and marketing representatives other than those who called on Decedent’s prescribers, and other evidence not relied upon by Decedent’s prescribers, as well as evidence of or reference to any other claims, actions, or legal proceedings related to Neurontin.

3. Any testimony of David Franklin or evidence of, or reference to, the separate and unrelated *qui tam* action styled *United States ex rel. Franklin v. Parke-Davis, Division of Warner-Lambert Company, & Pfizer Inc.*, Civil Action No. 1:96-DV-11651-PBS (D. Mass filed Aug. 13, 1996).

4. All evidence of and references to Food and Drug Administration regulatory actions related to Neurontin, including labeling, labeling changes, and patient information guides for Neurontin, that were issued after Richard Smith's death in May 2004.

5. Conduct unrelated to Neurontin, including (i) an August 31, 2009, settlement among Pfizer, the United States Department of Justice, and certain other government agencies, pursuant to which Pfizer and the Government agreed to settle certain *qui tam* actions against Pfizer involving drugs other than Neurontin and (ii) a plea agreement between the Government and Pharmacia & Upjohn Company, Inc. involving the drug Bextra, as well as any related government finding or investigation in connection with the August 2009 Settlement or Pharmacia Plea.

6. Miscellaneous matters including references to Plaintiff's pleadings; evidence of or references to Defendants' corporate status, size, profits, financial condition, or employee compensation; evidence of or references to alleged conduct of a generic "pharmaceutical industry" or "drug companies"; references to the cost or resources of Defendants' legal defense or to the size, location, other clients, or nature of the legal practice of Defendants' or Plaintiff's law firms; evidence of or references to Defendants' insurance; references to the presence or absence of Defendants' corporate representatives at trial; evidence of or references to how Decedent's beneficiaries will use any jury award if Plaintiff prevails; attempts to instruct the jury as to the effect of its answers to the questions posed in the jury verdict form; references to

the Golden Rule; evidence of or references to discovery disputes between the parties or other discovery activities by the parties; and post-mortem photographs.

7. Evidence of or reference to anecdotal adverse event reports.

8. Evidence, references, testimony or argument that Plaintiff's decedent's adult children have suffered any compensable harms as a result of their father's death. Any evidence or argument explicitly or impliedly suggesting that the impact of decedent's suicide on the adult children has any bearing on the amount of "consortium" damages, if any, that the jury might be asked to award to Plaintiff Ruth Smith as a result of her husband's suicide.

9. Testimony of Professor Charles King, III, an economist whom Plaintiff has designated as an expert witness. Professor King's testimony is inadmissible because it is irrelevant to the particular facts of this case, substantially prejudicial, and the product of unreliable methodology.

DEFENDANTS' OBJECTIONS

Exhibit Number	Document Description	Defendants' Objections
PX0040	Medical Records: Baptist Hospital	No Objection
PX0041	Medical Records: Baptist Hospital Pathology	No Objection
PX0042	Medical Records: Baptist Hospital Psychiatric	No Objection
PX0043	Medical Records: Berklacich, Frank MD	No Objection
PX0044	Medical Records: Blue Cross Blue Shield of TN	No Objection
PX0045	Medical Records: Cato, James MD	No Objection
PX0046	Medical Records: Centennial Medical Center	No Objection
PX0047	Medical Records: Centennial Medical Center	No Objection
PX0048	Medical Records: Centers for Medicare Medicaid Services	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX0049	Medical Records: Colon & Rectal Surgery Associates	No Objection
PX0050	Medical Records: Crawford, Myles DC	No Objection
PX0051	Medical Records: Eckerd Drug #3483 Pharmacy	No Objection
PX0052	Medical Records: Eckerd Drugs Pharmacy	No Objection
PX0053	Medical Records: Eckerd Drugs Pharmacy	No Objection
PX0054	Medical Records: Forensic Medical Autopsy	No Objection
PX0055	Medical Records: Forensic Medical Autopsy	No Objection
PX0056	Medical Records: Hampf, Carl MD	No Objection
PX0057	Medical Records: Hampf, Carl MD	No Objection
PX0058	Medical Records: Hampf, Carl MD	No Objection
PX0059	Medical Records: Harwell, William B., Jr. MD	No Objection
PX0060	Medical Records: Harwell, William B., Jr. MD	No Objection
PX0061	Medical Records: Heart & Vascular Clinic	No Objection
PX0062	Medical Records: Heart & Vascular Clinic	No Objection
PX0063	Medical Records: Heritage Medical Associates	No Objection
PX0064	Medical Records: Heritage Medical Associates	No Objection
PX0065	Medical Records: Heritage Medical Associates	No Objection
PX0066	Medical Records: Heritage Medical Assocs	Authenticity
PX0067	Medical Records: Heritage Medical Assocs	No Objection
PX0068	Medical Records: Heritage Medical Assocs	No Objection
PX0069	Medical Records: Kaswinkel, Daryl MD	No Objection
PX0070	Medical Records: Loden Vision Center	No Objection
PX0071	Medical Records: Mackey, Edward MD	No Objection
PX0072	Medical Records: Mackey, Edward MD	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX0073	Medical Records: McCombs, Paul MD	No Objection
PX0074	Medical Records: McCombs, Paul MD	No Objection
PX0075	Medical Records: McCombs, Paul MD Howell Allen Clinic	No Objection
PX0076	Medical Records: Medical Examiner's Report	No Objection
PX0077	Medical Records: MOHS Surgery & Dermatology	No Objection
PX0078	Medical Records: Neurological Surgeons	No Objection
PX0079	Medical Records: Neurosurgical Associates	No Objection
PX0080	Medical Records: Neurosurgical Associates	No Objection
PX0081	Medical Records: Otolaryngology Assoc of TN	No Objection
PX0082	Medical Records: Otolaryngology Assoc of TN	No Objection
PX0083	Medical Records: Premier Orthopedics	No Objection
PX0084	Medical Records: Spalding & Nesbitt Urology Clinic	No Objection
PX0085	Medical Records: Spalding & Nesbitt Urology Clinic	No Objection
PX0086	Medical Records: Stasko, Thomas MD	No Objection
PX0087	Medical Records: TN Orthopedic Alliance Medical	No Objection
PX0088	Medical Records: University Medical Center	No Objection
PX0089	Medical Records: University Medical Center	No Objection
PX0090	Medical Records: University Medical Center	No Objection
PX0091	Medical Records: Urology Associates	No Objection
PX0092	Medical Records: Vanderbilt University Medical Center	No Objection
PX0093	Medical Records: Vanderbilt University Medical Center	No Objection
PX0094	Medical Records: Walgreens Pharmacy	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX0095	Medical Records: Walgreens Pharmacy	No Objection
PX0096	Medical Records: Wood, Christopher DDS	No Objection
PX0097	Medical Records: Wood, Christopher DDS	No Objection
PX0101	Death Certificate	No Objection
PX0102	Funeral Home Signature Book	No Objection
PX0103	Internal Revenue Service	No Objection
PX0104	Letters Testamentary	No Objection
PX0105	Nashville Office Machines	No Objection
PX0106	Nashville Police Dept Report	No Objection
PX0107	Obituary	No Objection
PX0109	Suicide note	No Objection
PX0108	Smith Family DVD	Relevance; Probative Value Outweighed
PX0110	Call Notes	Authenticity;Hearsay;Hearsay within hearsay;Relevance
PX0111	Call Notes	Authenticity;Relevance
PX0112	Samples	Authenticity;Relevance
PX0113	XLS of McCombs NDC data	Authenticity;Relevance
PX0114	Call Notes	Authenticity;Relevance
PX0115	Handwritten Notes on Medical Records by Smith	No Objection
PX0116	Handwritten Notes on Medical Records by Smith	No Objection
PX0117	Mackey CV	No Objection
PX0118	Mackey Smith Records	No Objection
PX0119	Mackey Call Notes	Authenticity;Relevance
PX0120	2004 Neurontin Label	No Objection
PX0121	Information	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX0122	1992 Clinical Review	No Objection
PX0123	Affidavit of David Franklin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Plea
PX0199	Metropolitan Police Department Homicide Unit Supplemental Report – Richard Smith	No Document Produced

Exhibit Number	Document Description	Defendants' Objections
PX2000	Warner-Lambert guilty plea in United States v. Warner Lambert dated June 7, 2004	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea
PX2001	Information in United States v. Warner Lambert, dated May 13, 2004	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea
PX2002	Sentencing Memorandum of the United States	Probative Value Outweighed;Relevance: Plea
PX2003	Division of Neuropharmacological Drug Products Combined Medical-Statistical Review NDA: 20-235, Indication: Adjunctive Medication	Hearsay;Probative Value Outweighed;Relevance: Other Events
PX2004	Behavioural Disturbance with Gabapentin, Professor Michael Trimble	No Objection
PX2005	Michael Trimble, Psychosis with Gabapentin (1995);	Authenticity
PX2006	RE: GABA and PMDD	Hearsay within hearsay
PX2007	FDA Advisory Committee meeting slide presentation by Dr. J Cramer on July 10, 2008	Document Not Produced
PX2008	FDA. Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee and the Psychopharmacologic Drugs Adviso	Relevance: New Warning
PX2009	Background Package for July 10 Advisory Committee	No Objection
PX2010	Pfizer Lyrica & Neurontin slide presentation presented at FDA Advisory Committee meeting on July 10, 2008.	No Objection
PX2011	GlaxoSmithKline Lamictal slide presentation at FDA Advisory Committee Meeting on July 10, 2008	Document Not Produced
PX2012	Katz R. Memorandum. Briefing Document for the July 10,2008 FDA Advisory Committee Meeting to Discuss Antiepileptic Drugs (AEDs) a	Authenticity;Hearsay

Exhibit Number	Document Description	Defendants' Objections
PX2014	Transcript of Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee and the Psychopharmacologic Dru	No Objection
PX2015	Video of July 10, 2008 Advisory Committee Hearing	Hearsay; New Warning
PX2016	FDA Advisory Committee Meeting Briefing Documents dated July 10, 2008:	No Objection
PX2017	FDA Alert May 5, 2009	Hearsay; Probative Value Outweighed; Relevance: New Warning
PX2018	FDA Letter to Sponsors 12-2008	Hearsay; Probative Value Outweighed; Relevance: New Warning
PX2019	Neurontin Label April 2009	Probative Value Outweighed; Relevance: New Warning
PX2020	Disclosure of Information By David Franklin (Exhibit 3)	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Plea
PX2021	Crone Notice to Admit 11-29-2006	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events
PX2022	Crone Defendant Responses to Notice to Admit 2-5-2007	Hearsay; Probative Value Outweighed; Relevance: Other Events
PX2023	Crone Defendant Responses to Notice to Admit 7-31-2007	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events
PX2024	Crone Defendant Responses to Notice to Admit 12-7-2007	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events
PX2041	Curriculum Vitae of Dr. Michael Robert Trimble	Hearsay; Probative Value Outweighed; Relevance
PX2046	label for Neurontin (gabapentin capsules, tablets and oral solution) distributed by Parke-Davis, Revised January 2007	Relevance

Exhibit Number	Document Description	Defendants' Objections
PX2054	excerpts of David J. Rowbotham, Clinical Expert Report and Written Summary of Clinical Studies, Neuropathic Pain, Neurontin Capsul	Rule of Completeness
PX2055	excerpts from custodial file C. Taylor Gabapentin: Pharmacology Written Summary	Rule of Completeness
PX2061	Gabapentin Data Capture Aid	Authenticity;Relevance
PX2073	excerpt of Food and Drug Administration, HHS, 21 CFR Ch. I (4-1-07 Edition) §201.57	Hearsay;Rule of Completeness
PX2078	Pfizer Global Research and Development Research Report No.: RR-REG 720-30134 (November 28, 2001)	Rule of Completeness
PX2079	Parke-Davis Pharmaceutical Research Division Memorandum from V. Trudeau to R. DeJong (May 8, 1990)	Probative Value Outweighed;Relevance;Relevance: Other Events
PX2084	Defendant Lyrica Risk Management Committee Meeting, Power Point of Rachel E. Sobel, Epidemiology and Risk Management (September 1	Probative Value Outweighed;Relevance;Relevance: Other Events
PX2088	Curriculum Vitae of Cheryl D. Blume, Ph.D.	Hearsay;Probative Value Outweighed;Relevance
PX2089	United States Patent No. 4,910,023 (March 20, 1990)	Probative Value Outweighed;Relevance
PX2090	Declaration of Keith Altman (April 4, 2008)	Hearsay;Probative Value Outweighed;Relevance: Other Events
PX2093	Cynthia G. McCormick, M.D., Division of Neuropharmacological Drug Products, Review and Evaluation of Clinical Data (September 27,	No Objection
PX2103	FDA FOI Documents for Neurontin NDA Approval (July 28, 1994)	No Objection
PX2105	page from the Neurontin NDA 20-235 which includes listing of patents	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness
PX2106	portion of FDA's clinical review of Neurontin associated with the 2002 approval for post herpetic neuralgia (PHN) dated May 24, 2	Hearsay;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness

Exhibit Number	Document Description	Defendants' Objections
PX2107	portion of the Gabapentin Pediatric Integrated Summary of Safety dated December 3, 1999	Other;Probative Value Outweighed;Relevance;Rule of Completeness
PX2109	Appendix C.55 of Pfizer's Integrated Summary of Safety for the Post Herpetic Neuralgia NDA dated August 6, 2001	Probative Value Outweighed;Relevance;Relevance: Other Events
PX2110	chart created under F.R.E 1006 entitled Percentage of Serious Reports for Suicidal and Self Injurious Behaviors(HLT) By Indicatio	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Other Events
PX2111	Pfizer correspondence From Manini Patel of Pfizer to Russell Katz of the FDA dated September 10, 2004	No Objection
PX2114	FDA letter from Russell Katz to Mary Ann Evertsz dated May 3, 2006	No Objection
PX2115	memorandum from Maribeth Lazzaro, Ph.D. to Tina Carriero, dated May 13, 2005	Relevance
PX2118	pages from the transcript of the December 14, 1992 meeting of FDA's Peripheral and Central Nervous Systems Drugs Advisory Committ	Authenticity;Hearsay;Rule of Completeness
PX2123	FDA Approval Letter dated May 24, 2002	No Objection
PX2127	letter from Lisa Stockbridge of FDA to Andrea Garrity of Pfizer, dated June 29, 2001	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance;Relevance: Marketing
PX2128	FDA alert concerning Gabitril dated February 18, 2005 printed from the FDA website, www.fda.gov	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX2129	portion of the product label for Avonex	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX2134	form 356h dated August 6, 2001 signed by Drusilla Scott	No Objection
PX2135	chart created under F.R.E 1006 entitled Cumulative Percentage Reports of Suicidal and Self Injurious behavior(HLT) for Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX2136	chart created under F.R.E 1006 entitled High Level Terms Greater than 1% of Serious Adverse Event Reports Through March 31, 2002	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX2138	e-mail from Dennis Kargman, dated March 6, 2006, with Gabapentin Data Capture Aid attached	Probative Value Outweighed;Relevance: Other Events
PX2145	portion of a PowerPoint Presentation entitled Clinical Development in the Slipstream of Gabapentin	Probative Value Outweighed;Rule of Completeness
PX2146	portion of a document entitled Neurontin Product Monograph.	Rule of Completeness
PX2151	memorandum from Paul Leber of FDA to Robert Temple of FDA, dated December 13, 1993	No Objection
PX2153	document entitled Response to FDA Regarding Suicide and Suicide Attempts in Neurontin (Gabapentin) Clinical Trials – Phase I study	No Objection
PX2154	21. C.F.R. § 314.70. Ch. I (4-1-06 Edition)	Hearsay
PX2159	portion of Appendix C.3. of Parke-Davis Research Report 720-02957 entitled Narrative Summaries and Tabular Data for Study Participants	Rule of Completeness
PX2160	Annotated Labeling from NDA 21-397 Vol 001	No Objection
PX2169	FDA Manual of Policies and Procedures policy MAPP 6020.10 dated July 2, 2003 concerning Dear Health Care Professional letter	Hearsay;Relevance
PX2176	Jeffrey Mohan, Gabapentin and Suicide (Mar. 14, 2006)	Relevance;Rule of Completeness
PX2191	Record of FDA Contact regarding NDA 20-235 (Apr. 26, 2004)	No Objection
PX2193	Email from Courtney Calder, Center for Drug Evaluation and Research (FDA), to Molly Powers, Pfizer (Oct. 20,2005)	No Objection
PX2194	Email from Courtney Calder, Center for Drug Evaluation and Research (FDA), to Manini Patel, Pfizer (Oct. 27, 2005)	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX2195	Email from Manini Patel, Pfizer, to Courtney Calder, Center for Drug Evaluation and Research (FDA) (Nov. 18,2005)	No Objection
PX2196	letter from Mary Ann C. Everts, Pfizer, to Russell Katz, M.D., Center for Drug Evaluation and Research (FDA) (with enclosed rev	No Objection
PX2224	ECF 1761 Declaration of Ilyas Rona Exhibit 0002: 720-02957_(Official)	No Objection
PX2228	ECF 1761 Declaration of Ilyas Rona Exhibit 0007: 2008-4372b1-01-FDA	No Objection
PX2243	ECF 1761 Declaration of Ilyas Rona Exhibit 0041: 720-03092_Investigators'_Brochure – Part 1	No Objection
PX2324	ECF 1761 Declaration of Ilyas Rona Exhibit 0156: 720-03908	No Objection
PX2329	ECF 1761 Declaration of Ilyas Rona Exhibit 0162: 720-04130	No Objection
PX2332	ECF 1761 Declaration of Ilyas Rona Exhibit 0167: 430-00125	No Objection
PX2342	ECF 1761 Declaration of Ilyas Rona Exhibit 0178: PFIZER_LKNAPP_0050385	Hearsay;Hearsay within hearsay
PX2366	ECF 1761 Declaration of Ilyas Rona Exhibit 0218: PFIZER_LESLIETIVE_0020631	Hearsay within hearsay;Relevance
PX2475	ECF 1761 Declaration of Ilyas Rona Exhibit 0367: 720-03675_(Official)	No Objection
PX2476	ECF 1761 Declaration of Ilyas Rona Exhibit 0368: 430-00124	No Objection
PX2477	ECF 1761 Declaration of Ilyas Rona Exhibit 0369: 995-00070_945-211_(Part_I)	Rule of Completeness
PX2487	ECF 1761 Declaration of Ilyas Rona Exhibit 0380: 995-00057_(Official)	No Objection
PX2502	ECF 1761 Declaration of Ilyas Rona Exhibit 0397: PFIZER_LKNAPP_0023336	Probative Value Outweighed;Relevance: Marketing
PX2535	ECF 1761 Declaration of Ilyas Rona Exhibit 0435: 720-03779	No Objection
PX2543	ECF 1761 Declaration of Ilyas Rona Exhibit 0445: FDA Approved Labeling Text dated February 2005	Relevance

Exhibit Number	Document Description	Defendants' Objections
PX2571	ECF 1761 Declaration of Ilyas Rona Exhibit 0477: 4301-00066_(Official)	No Objection
PX2573	ECF 1761 Declaration of Ilyas Rona Exhibit 0479: 995-00074_(p1-366)	No Objection
PX2574	ECF 1761 Declaration of Ilyas Rona Exhibit 0480: 995-00085	No Objection
PX2743	ECF 1761 Declaration of Ilyas Rona Exhibit 0663: 720-04378	Rule of Completeness
PX2744	ECF 1761 Declaration of Ilyas Rona Exhibit 0664: 720-04483_(Official)	Rule of Completeness
PX2745	ECF 1761 Declaration of Ilyas Rona Exhibit 0665: 720-04479	Rule of Completeness
PX2746	ECF 1761 Declaration of Ilyas Rona Exhibit 0666: 720-04455	Rule of Completeness
PX2747	ECF 1761 Declaration of Ilyas Rona Exhibit 0667: 720-04471	Rule of Completeness
PX2781	E-mail from Larry Alphs to John Marino re: National Public Radio-NEURONTIN Story to be aired TONIGHT	Probative Value Outweighed;Relevance: Other Events
PX2784	E-mail from Christine Aschenbach to Allison Fannon, Larry Alphs, Angela Crespo, Steve Piron, Bruce Parsons, Ellen Dukes re: PSC M	Probative Value Outweighed;Relevance
PX2787	E-mail from Kirk Taylor to Leslie Tive & Timothy Hsu re: Professor Martin Koltzenburg question	Other Indications;Probative Value Outweighed;Relevance
PX2788	E-mail from Cathy Sigler to Leslie Tive re: Neurontin NPR Story-Med Info Q&A	Hearsay;Probative Value Outweighed;Relevance
PX2789	Presentation: Suicidality: The Problem and Emerging Solutions by Larry Alphs	Authenticity;Rule of Completeness
PX2790	E-mail from Larry Alphs to Cathy Sigler & Leslie Tive re: Robert Siegel, host	Hearsay;Irrelevant: Other indications
PX2791	Division of Neuropharmacological Drug Products Review and Evaluation of Clinical Data, NDA 20-235	No Objection
PX2798	Response to FDA Regarding Suicide and Suicide Attempt in Neurontin (gabapentin) Clinical Trials and Postmarketing Surveillance da	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX2799	E-mail from Atul Pande to Lloyd Knapp re: GBP in Bipolar Disorder	Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing
PX2806	Generic Dear Sponsor Letter re: new drug application	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: New Warning;Relevance: Other Events
PX2808	Statistical Review and Evaluation Antiepileptic Drugs and Suicidality	No Objection
PX2810	Finkelstein Neurontin November 12, 2007	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events;Relevance: Plea
PX2812	Guidance for Industry, Good Pharmacovigilance Practices and Pharmacoeconomic Assessment March 2005	Hearsay
PX2813	Chart of suicide and self-injurious behaviour	Foundation;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX2818	Gabapentin Capsules 8.6 Integrated Summary of Safety Information	No Objection
PX2819	5-29-92 Application to Market a New Drug for Human Use or an Antibiotic Drug for Human Use, Neurontin	No Objection
PX2828	E-mail from Courtney Calder to Manini Patel re: proceeding with minor labeling changes pertaining to suicide-related events	No Objection
PX2866	Gabapentin for acute and chronic pain (Review) The Cochrane Collaboration	Hearsay
PX2887	Rheumatology Orthopedic Neurology Team Challenges and Opportunities	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX2898	E-mail from Tamela Martin to Louis Burke, Jefferson Campbell, Jeffrey Dodd, Craig Glover, Edwin McDaries, Daniel Morgan, Nicole P	Other;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness

Exhibit Number	Document Description	Defendants' Objections
PX2902	E-mail from Frederick Schmalberger to Stephen Sacchetti, Kurt Phillips and Mark Brown re: NEU-0183019 New Gabapentin Article in M	Probative Value Outweighed;Relevance: Marketing
PX2908	Agents of Change Journal Club Report, RON Specialty Representative: Sean Chase, Meeting Month: June 2002	Probative Value Outweighed;Relevance: Marketing
PX2910	Pfizer FYI only: Neurontin – Make it your #1 add on Therapy Start with Efficacy End with Efficacy	Foundation;Probative Value Outweighed;Relevance: Marketing
PX2912	E-mail from Mark Brown re: phn notes, Summary notes from David Fantini's team	Other;Probative Value Outweighed;Relevance: Marketing
PX2919	E-mail from Mark Brown to Daniel Linden,Suzanne Doft, Tamela Martin, Christopher Dowd and David Probert re: Topamax moving up wit	Probative Value Outweighed;Relevance
PX2921	NTN 2003 Operating Plan	Probative Value Outweighed;Relevance: Marketing
PX2922	E-mail from Suzanne Doft to Shilpa Patel re: NEU-0020717 Neurontin Advisory Boards, first recommendation to the board	Probative Value Outweighed;Relevance: Marketing
PX2966	E-mail from Lloyd Knapp to Drusilla Scott, Atul Pande, Stephen Gracon, Byron Scott, Robert Michael Poole re: GDRC-Nerve Conductio	Hearsay;Probative Value Outweighed;Relevance
PX2970	E-mail from Marino Garcia to Angela Crespo, Michael Rowbotham, David Probert, John Marino, Joan Kaplan, Kenna Reehil, Valerie Fla	Hearsay within hearsay;Other;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness
PX2971	E-mail from Meg Yoder to John Marino, Christine Grogan, Craig Glover, Suzanne Doft, Marino Garcia, Michael Rowbotham, David Probert, Allison Fannon, Steve Piron, Joan Kaplan, Angela Crespo, Leigh Anne Hemenway, Leslie Tive, Robert Glanzman, Elizabeth Muti	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Publications

Exhibit Number	Document Description	Defendants' Objections
PX2972	E-mail from Nancy Mancini to Lucy Castro, Daphne Nugent Laiken, Manini Patel re: Neurontin sales information needed	Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing; Relevance: Other Events
PX2973	Presentation: Rationale for a Social Phobia Clinical Program with Neurontin, GDRC Meeting November 8, 2001	Other; Probative Value Outweighed; Relevance
PX2982	Letter from Lisa Stockbridge, Ph.D, Regulatory Reviewer to Lucy Castro re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS #1	Hearsay; Non-final agency finding; Other; Probative Value Outweighed; Relevance: Marketing
PX2983	Letter from Lisa Stockbridge, Ph.D, Regulatory Reviewer to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS	Hearsay; Non-final agency finding; Other; Probative Value Outweighed; Relevance: Marketing
PX2988	E-mail from Manini Patel to Rudolf Altevogt, Bruce Parsons, Lloyd Knapp, Ileen Roos, Larry Alphs, Lucy Castro, Claire Wohlhuter,	Hearsay
PX2994	Gabitril (tiagabine hydrochloride) Tablets, Feb. 2005 product labeling text	No Objection
PX2998	Guidance for Industry, Adverse Reactions Section of Labeling for Human Prescription Drug and Biological Products – Content and Fo	No Objection
PX3022	Memo from Edda Guerrero re: Neurontin Tactics Planning Meeting	Relevance: Marketing
PX3023	1997 National Strategies and Tactics	Probative Value Outweighed; Relevance: Marketing
PX3042	Neurontin War Games Summary Report, April 3, 1996	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3049	Presentation: Toolbox Meeting, January 30, 1997	Probative Value Outweighed; Relevance: Marketing
PX3051	Memo from Clare Cheng & Carla Dago to A. Crook, J. Knoop, J. Rizzo, L. Ciancio, M. Friedman, S. Miller, D. Saltel, T. Albright re	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX3056	Neurontin gabapentin capsules New Hire Training, October 14, 1997	Probative Value Outweighed;Relevance: Marketing
PX3057	1998 Neurontin Tactics, Prepared 7-30-97 by Cline, Davis & Mann	Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing
PX3065	1999 Marketing Plan Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX3068	Neurontin 2003 Publications Plan Review of Capabilities and Strategic Plan, September 2002	Probative Value Outweighed;Relevance
PX3071	E-mail from Robert Glantzman to David Cooper, Allison Fannon, Angela Crespo, Bruce Parsons, David Probert, Suzanne Doft, Erica Jo	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels
PX3091	E-mail from David Cooper to Angela Crespo, Robert Glanzman, Sue Huang re: Backonja, proposed use of the non-peer reviewed IASP po	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX3111	Neurontin Market Overview	Probative Value Outweighed;Relevance: Marketing
PX3114	1998 Marketing Plan, Neurontin	Probative Value Outweighed;Relevance: Marketing
PX3118	Handwritten Memo from Trevor Polischuk to Laura re: data useful for Neurontin in neuropathic pain	Probative Value Outweighed;Relevance: Marketing
PX3120	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – January 1999 Data	Probative Value Outweighed;Relevance
PX3121	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – April 1999 Data	Probative Value Outweighed;Relevance
PX3122	Memo from Lynne Fredericks re: Anticonvulsant Market New Patient Starts – June 1999 Data	Probative Value Outweighed;Relevance
PX3123	New Prescriptions Chart	Hearsay within hearsay;Probative Value Outweighed;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX3124	Neurontin: 1999 Situation Analysis	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events
PX3129	E-mail from Suzanne Doft to XTEC Media re: NEU-0020634 Employer Ad Bd Slides	Probative Value Outweighed; Relevance
PX3133	Suzanne Doft, Individual Development Plan	Probative Value Outweighed; Relevance: Marketing
PX3134	Presentation: Incremental Market Potential With An FDA Approved Indication for Neuropathic Pain	Hearsay; Probative Value Outweighed; Relevance: Marketing; Rule of Completeness
PX3135	Presentation: Neuropathic Pain Positioning Strategy Research-Final Results from the U.S.	Hearsay; Probative Value Outweighed; Relevance: Marketing
PX3136	Suzanne Doft, Neurontin Marketing Team Draft, 2002 Personal Goals	Probative Value Outweighed; Relevance: Marketing
PX3138	Neurontin, Neuropathic Pain Issues in the Workplace, Meeting Report	Probative Value Outweighed; Relevance
PX3143	E-mail from John Marino re: NEU-0006528 OP2002 Review	Probative Value Outweighed; Relevance: Marketing; Relevance: Other Events
PX3145	Presentation: Neurontin-Pregabalin Strategic Priorities Discussion, June 10, 2003	Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing; Relevance: Other Events
PX3153	E-mail from Clare Kennedy to Suzanne Doft, Joe Butera, David Probert, Avanish Mishra, Andrea Zeuschner re: Lost revenue in Top 3	Probative Value Outweighed; Relevance
PX3156	Presentation: Neurontin, Performance, Market Overview, Opportunities-Strategies, Medical Platform, Finances	Authenticity; Hearsay; Probative Value Outweighed; Relevance
PX3157	E-mail from Angela Crespo to Christine Aschenbach, Allison Fannon re: Reckless contact information	Probative Value Outweighed; Relevance

Exhibit Number	Document Description	Defendants' Objections
PX3161	E-mail from Larry Alphs re: Neurontin in the WSJ and NY Times Today – December 20, 2002	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Relevance: Plea
PX3165	E-mail from Timothy Hylan to Lois Fitton, Richard O'Sullivan, Steve Romano, Jim Sage, Christopher Dowd re: NEU-0085355 Some infor	Irrelevant: Other indications; Probative Value Outweighed; Relevance
PX3166	E-mail from Claire Wohlhuter to Lloyd Knapp re: Q&A Backgrounder on suicide issue for distribution to PD2, Vista RX and Neurology	Relevance
PX3179	Draft: 2003 Unabridged Neurontin Medical Operating Plan, July 16, 2002	Probative Value Outweighed; Relevance
PX3198	2003 Neurontin Strategic and Tactical Planning Meeting July 31, 2002	Probative Value Outweighed; Relevance
PX3199	Memo from Cynthia de Luise re: Neurontin Product Maintenance and Pharmacovigilance (PMP) Team Meeting Minutes (17 January 2002)	Probative Value Outweighed; Relevance
PX3209	Presentation: Neurontin 2001 U. S. Operating Plan, October 11, 2000	Probative Value Outweighed; Relevance: Marketing
PX3210	Presentation: Neurontin Global Operating Plan 2001	Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX3211	Neurontin Publication Planning Meeting July 12, 2001	Probative Value Outweighed; Relevance
PX3277	Parke-Davis Pharmaceutical Research Division Research Report No. RR-X 720-02455 Titled: Investigator's Brochure – Gabapentin (CI-	Authenticity; Rule of Completeness
PX3278	Parke-Davis Pharmaceutical Research Division Research Report No. RR-X 720-03092 Titled: Investigator's Brochure – Gabapentin (CI-	No Objection
PX3279	Parke-Davis Pharmaceutical Research Division Research Report No. RR-X 720-03362 Titled: Investigator's Brochure for Neurontin- Ga	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX3280	Parke-Davis Pharmaceutical Research Division Research Report No. RR-X 720-03381 Titled: Investigator's Brochure for Neurontin- Ga	No Objection
PX3294	E-mail from Andrea Garrity to Lucy Castro, Manini Patel re: Policy on reprints- Washington Legal Foundation Ruling	Probative Value Outweighed;Relevance;Relevance: Marketing
PX3296	E-mail from Joe Feczko re: Neurontin, promotion and marketing	No Objection
PX3297	E-mail from John Marino re: DPC Neurontin – Final	Relevance;Relevance: Foreign Labels
PX3303	E-mail from John Wolleben to Lucy Castro, Martha Brumfield, Andrew Clair, Andrea Garrity re: Neurontin NOV	Probative Value Outweighed;Relevance: Marketing
PX3304	Summary of Spontaneous Post-Marketing Reports for Gabapentin, as of December 31, 2000	Probative Value Outweighed;Relevance
PX3309	E-mail from Lucy Castro to Valerie Flapan, Andrea Garrity re: Neurontin Major Markets Business Plan	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX3316	Center for Drug Evaluation and Research, Application 21-397, 21-423, 21-424 Approval Letter	No Objection
PX3343	Assessment of Suicide and Related Behaviors in Patients Treated with the – Ligands, Gabapentin and Pregabalin, April 29, 2008	Hearsay within hearsay;Relevance: New Warning
PX3344	Letter from Mary Ann Coronel Evertsz,RPh to Russell Katz, MD re: Neurontin (gabapentin) capsules NDA 20-235, Neurontin (gabapenti	No Objection
PX3345	Letter from Molly Powers to Russell Katz re: NDA 21-446-Lyrica (pregabalin) Capsules C-V, Request for Information – Response to F	Relevance
PX3347	The Relationship Between Antiepileptics and Suicide Attempts	No Objection
PX3351	Chart: Columns titled Trial, Eposure Days, etc.	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX3352	Robert Gibbons invoices to Wheeler Trigg and Kenedy LLP	Hearsay
PX3354	Chart: All Diags for Bipolar	Hearsay; Probative Value Outweighed; Relevance: Other Events
PX3373	SAS Output	Hearsay
PX3385	Presentation: Statistical Issues in Drug Safety: The curious case of Anti depressants, Anticonvulsants, ..., and Suicide	Hearsay
PX3402	E-mail from Robert Glanzman re: Neurontin Product Profiles	Hearsay within hearsay; Relevance; Relevance: Foreign Labels
PX3404	Presentatin dated May 23, 2001	Probative Value Outweighed; Relevance
PX3410	Presentation: Roles and Responsibilities for Manuscript Teams	Probative Value Outweighed; Relevance
PX3412	Key Message Sign-Off Sheet – Neurontin Publication Plan Key Messages	Probative Value Outweighed; Relevance
PX3436	E-mail from John Marino re: Neurontin Overdose Reported	Probative Value Outweighed; Relevance: Other Events
PX3437	E-mail from Robert Glanzman to John Marino re: Neurontin Overdose Reported	Probative Value Outweighed; Relevance: Other Events
PX3438	E-mail from Robert Glanzman re: Post Herpetic Neuralgia	Probative Value Outweighed; Relevance; Relevance: Other Events
PX3439	E-mail from Robert Glanzman re: Neurontin News, the data in bipolar disease with gabapentin isn't very good	Hearsay; Relevance
PX3442	Mechanisms of action: A Guide for Sales Colleagues	Probative Value Outweighed; Relevance
PX3450	NTN 2003 Operating Plan, Strategies and Tactics	Relevance: Marketing
PX3461	NTN 2003 Operating Plan – Strategies and Tactics	Hearsay within hearsay; Relevance: Marketing
PX3462	Neurontin: 2001 Situation Analysis	Probative Value Outweighed; Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX3463	Letter from Lesley Frank to William Merino re: Parke-Davis promoting Neurontin for off-label uses	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX3469	FAX from Laura Governale to Robin Ditts re: Neurontin Meeting Minutes	No Objection
PX3484	Corporate Integrity Agreement between the Office of Inspector General of the Department of Health and Human Services and Pfizer	Probative Value Outweighed;Relevance: Plea;Rule of Completeness
PX3520	Letter from Paula Trushin to James Jefferson re: article Benzodiazepines and Anticonvulsants for Social Anxiety Disorder (Social	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Marketing
PX3521	Letter from James Jefferson to Jane Byun re: Benzodiazepines and Anticonvulsants for Social Anxiety Disorder (Social Phobia)	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX3538	Neurontin U.S. Market Update November 2000	Authenticity;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX3551	21 CFR (4-1-06 Edition), Change in ownership of an application	Hearsay
PX3554	Periodic Safety Update Report for: Gabapentin, August 1, 1998 – January 31, 1999	Relevance: Foreign Labels
PX3556	request for additional trial-level information pertaining analysis of suicidal thoughts and behavior in anti-epileptic drugs	Hearsay within hearsay
PX3557	Division of Neuropharmacological Drug Products Combined Medical-Statistical Review, NDA: 20-235, Indication: Refractory Partial E	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX3594	Letter from Russell Katz to Robert Clark re: safety labeling changes	Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning
PX3608	Presentation: Neurontin by Leslie Tive	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX3617	E-mail from Robert Glanzman to Jill Kerrick-Walker re: GBP and mood	Hearsay within hearsay; Probative Value Outweighed; Relevance
PX3637	Memo from Cynthia de Luise re: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3651	Fax from Lisa Stockbridge to Andrea Garrity re: NDA #21-129 Neurontin (gabapentin) Oral Solution, MACMIS #9821, comments on propo	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing
PX3653	E-mail from Drusilla Scott re: Agency version of Neurontin Label (action date of 4/24/02 targeted) Emergency meeting of LSC	Non-final agency finding
PX3678	E-mail from Clare Cheng to A. Crook re: Neurontin 1997 Tactical Plan	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3683	Neurontin (gabapentin) Program Overview, Feb. 23, 1999	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3724	Research Report titled: An Iterim Report on an Open-Label, Uncontrolled, Multicenter Study to Determine the Long Term Safety and	Hearsay within hearsay; Probative Value Outweighed; Relevance: Other Events
PX3729	Research Report: Integrated Summary of Safety Information of Gabapentin Capsules (Item 8.6 of the gabapentin NDA)	Authenticity
PX3747	Presentation: Neurontin OP Presentation Market Analytics Review, Nancy Mancini, May 1, 2001	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3748	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX3750	E-mail from Nancy Mancini to Avanish Mishra re: Update request, NTN's uses by indication	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX3764	Presentation: Market Analytic Update	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3769	Presentation: Quarterly Brand Review Neurontin 4-98	Hearsay; Probative Value Outweighed; Relevance: Marketing
PX3770	Neurontin Proposed Strategies and Tactics	Probative Value Outweighed; Relevance: Marketing
PX3772	Global Development Review Committee Meeting, September 19, 2001	Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing; Relevance: Other Events
PX3773	Presentation: Rationale for an Expanded DPN Clinical Program with Neurontin	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3775	E-mail from John Marino to Stephen Graco, Lloyd Knapp, Atul Pande, Drusilla Scott, Byron Scott re: GDRC – Nerve Conduction Discussion	Hearsay; Relevance
PX3776	E-mail from Kirk Taylor re: My thoughts on the POPP Study Investigator meeting	Authenticity; Hearsay
PX3777	John Marino 2001 Goals	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels; Relevance: Marketing
PX3778	John Marino OP2002 Goals	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels; Relevance: Marketing
PX3779	WW Neurontin Team 2003 Goals	Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX3780	Letter from Norm Phillips, Vice President Physicians' World Communications Group to John Marino re: contract with group in Morris	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing; Rule of Completeness

Exhibit Number	Document Description	Defendants' Objections
PX3783	E-mail from John Marino to Marino Garcia re: Neurontin in Bipolar Disorder	Hearsay within hearsay; Probative Value Outweighed; Relevance
PX3785	Letter from Lesley Frank, Department of Health & Human Services to William Merino re: Parke-Davis promoting Neurontin for off lab	Hearsay; Hearsay within hearsay; Non-final agency finding; Probative Value Outweighed; Relevance: Marketing
PX3787	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing; Relevance: Other Events
PX3788	Slide titled: Neurontin (drug uses)	Rule of Completeness
PX3790	Slides: US Neurontin Use Data	Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX3791	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmetic Act	Non-final agency finding; Probative Value Outweighed; Relevance; Relevance: Marketing
PX3799	CV of Ronald W. Maris, PhD	Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance
PX3803	Presentation: Suicide and SSRIs, Ronald Wm Maris, PhD, A.A.F.S. Annual Conference, February 20, 2007	Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance
PX3823	Presentation: Neurontin Market Assessment Meeting	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing
PX3849	FDA Alert: Information for Healthcare Professionals Suicidality and Antiepileptic Drugs	Probative Value Outweighed; Relevance: New Warning; Rule of Completeness
PX3850	FDA Alert: Information for Healthcare Professionals Suicidality and Antiepileptic Drugs	Authenticity; Probative Value Outweighed; Relevance; Relevance: New Warning; Rule of Completeness
PX3851	Record of FDA Contact, Report Outcome of FDA Gabapentin NDA acceptability to file review meeting of 3-11-92	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX3852	Memo from V. Trudeau to R. Delong re: Follow-up Adverse Event Report	Hearsay;Probative Value Outweighed;Relevance: Other Events
PX3853	Presentation: Suicidality and Anti-Epileptic Drugs: Status of Clinical Trial Data Analysis by Evelyn Mentari MD	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance
PX3854	Affidavit of David Franklin PhD	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Plea
PX3855	Client Register, Shook, Hardy & Bacon LLP	Hearsay;Probative Value Outweighed;Relevance
PX3856	McCormick Consultation, LLC invoices to Shook, Hardy & Bacon	Document Not Produced
PX3857	Letter from Andrew Finkelstein to Russell Katz re: 258 MedWatch forms, each represents a suicide of an American who was on Neuron	No Objection
PX3862	Letter from Robert Temple to Janeth Turner re: NDA 20-235, new drug application dated January 15, 1992	No Objection
PX3865	Record of FDA Contact – Request clarification from the gabapentin NDA	No Objection
PX3867	Appendix C.3 Narrative Summaries and Tabular Data for Study Participants Who Withdrew Due to Adverse Events	Authenticity;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness
PX3868	Gabapentin Open Label-Treatment Forms	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX3901	Presentation: The Neurontin and Pregabalin Positioning Study, May 2001	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX3982	Presentation: Neurontin 2004 Operating Plan, September 30, 2003	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX3986	Email from Suzanne Doft to Avanish Mishra re: NEU-0019169 Article: Change in Opioid use after the initiation of gabapentin therapy	Authenticity;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX3989	Presentation: Neurontin Business in 2H 2004	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing
PX3996	US Neurontin Marketing Team 2004 Goals	Probative Value Outweighed; Relevance: Marketing
PX4034	Memo from Cynthia de Luise re: Draft: Neurontin PMP Team Meeting (09 May 2001) Minutes	Probative Value Outweighed; Relevance: Marketing
PX4038	Pfizer Drug Safety (Ann Arbor) Product Reference Guide Gabapentin CI #0945, NDA #20-235, International Birth Date Feb. 5, 1993	Authenticity; Rule of Completeness
PX4040	Email from Michael Campbell to Cathy Sigler, Cynthia de Luise, Christopher Pacella, Larry Alphs, Leslie Tive, Rudolf Altevogt, Ma	Rule of Completeness
PX4042	Appendix, Second Safety Update Summary of Adverse Events	Probative Value Outweighed; Relevance: Other Events; Rule of Completeness
PX4045	Summary of Spontaneous Post-Marketing Reports for Gabapentin, as of March 31, 2002 All Cases	Probative Value Outweighed; Relevance: Other Events
PX4046	Email from Christopher Pacella to Philip Arena, Lisa Cortina, Robert Glanzman, Alan Hassell, Manfred Hauben, Manini Patel, Alvaro	No Objection
PX4047	Memo from Christopher Pacella re: Gabapentin Product Maintenance and Pharmacovigilance Labeling Core Working Group, July 25, 2002	No Objection
PX4048	Angina Pectoris-Chest Pain-Chest Pain Substernal-Pain Chest and Gabapentin (Draft)	Relevance
PX4049	Memo from Christopher Pacella re: Gabapentin Product Maintenance and Pharmacovigilance Labeling Core Working Group, October 14, 2	No Objection
PX4050	Memo from Christopher Pacella re: Gabapentin Product Maintenance and Pharmacovigilance Labeling Core Working Group, October 23, 2	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX4051	Pfizer Pharmaceutical Group (Private) Core Data Sheet, Product Document title: Gabapentin, January 30, 2003	No Objection
PX4053	Memo from Alan Walker to Dr. Klaus Laesecke, Dr. Mark Pierce, Ms. Lene Ulrich re: \$500 Million	Hearsay within hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing
PX4056	Memo from Atul Pande to John Boris re: Gabapentin approvals	Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX4062	Marketing Assessment Neurontin in Neuropathic Pain and Spasticity	Relevance: Marketing
PX4069	Email from Lloyd Knapp to Timothy Hsu re: Gabapentin in bipolar disorder: randomized controlled trials	Hearsay within hearsay; Irrelevant: Other indications; Other; Probative Value Outweighed; Relevance; Relevance: Marketing
PX4077	Table 15: Summary of All Adverse Events in >1% of Patients in Placebo-Controlled Studies, by Body System and Treatment Group	No Objection
PX4078	Narrative Summaries and Tabular Data for Study Participants Who Withdrew Due to Adverse Events	No Objection
PX4081	Parke-Davis Pharmaceutical Research Division of Warner-Lambert Company Research Report Title: Gabapentin Adjunctive Treatment in	Irrelevant: Other indications
PX4082	Parke-Davis Pharmaceutical Research Division of Warner-Lambert Company Research Report Title: Investigators' Brochure – Neurontin	Rule of Completeness
PX4087	Chart: AER ID- AER NO-SEQ REACT-NAME-PF_NAME-HIT NAME-HLGT NAME-SOC NAME-DATE REPORTED-YQ-SENOUS REPORT-CLINICAL TRIAL	Probative Value Outweighed; Relevance: Other Events
PX4132	MedWatch report	Hearsay within hearsay; Probative Value Outweighed; Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX4133	Case details	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4143	Memo to Mary Parks from Kate Gelperin, Lanh Green re: Thiazolidinediones and Cardiovascular Adverse Effects	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX4144	Graph: Percentage of Cardiac SOC Reports for Various Anti-Diabetic Drugs	Probative Value Outweighed;Relevance;Relevance: Other Events
PX4147	Declaration of Cheryl Blume, PhD	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX4148	Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company Gabapentin Open-Label Treatment Forms	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4149	Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company Gabapentin Open-Label Treatment Forms	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4157	Assessment of Suicide and Related Behaviors in Patients Treated with the – Ligands, Gabapentin and Pregabalin, April 29, 2008	Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning;Relevance: Other Events
PX4159	Declaration of Keith Altman	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events
PX4160	Pfizer Neuropathic Pain PBM Advisory Board Executive Summary, March 3-4, 2002	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4207	Gabapentin Mechanism Work Group – Team Charter, September 5, 2000	Authenticity;Hearsay
PX4208	Email from John Marino re: Neurontin Labeling – Ground Rules and Agenda – Meeting May 22	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX4209	Email from Drusilla Scott re: Neurontin PHN sNDA	Hearsay within hearsay;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX4212	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmeti	Probative Value Outweighed;Relevance: Marketing
PX4235	Lidoderm Label	Relevance
PX4253	Description of gabapentin	Hearsay;Hearsay within hearsay
PX4254	Summary of gabapentin	Hearsay;Hearsay within hearsay
PX4256	Summary of neurontin	Hearsay within hearsay
PX4265	Email from John Marino re: National Public Radio – Neurontin Story to be Aired Tonight	Hearsay;Hearsay within hearsay;Privilege;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events;Relevance: Plea
PX4273	Pfizer Global Research & Development Research Report titled: Summary of Preclinical Pharmacological Studies with Gabapentin (CI-0	No Objection
PX4274	Mechanisms of action – A guide for sales colleagues	Hearsay within hearsay;Relevance
PX4285	Letter from Lesley Frank to William Merino re: Parke-Davis promoting Neurontin for off-label uses	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4286	Review and Evaluation of Clinical Data, NDA 20-235 Indication: Refractory Epilepsy, January 31, 1992	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance
PX4287	Letter from Lisa Stockbridge to Andrea Garrity re: a slim jim for Neurontin that is misleading and in violation of the Federal Fo	Authenticity;Probative Value Outweighed;Relevance: Marketing
PX4288	Letter from Lisa Stockbridge to Lucy Castro re: a model for Neurontin that is in violation of the Federal Food, Drug, and Cosmeti	Authenticity;Probative Value Outweighed;Relevance: Marketing
PX4289	Settlement Agreement and Release between the United States of America and Pfizer and Warner-Lambert	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea

Exhibit Number	Document Description	Defendants' Objections
PX4290	United States of America v Warner Lambert Company General Allegations	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX4291	Neurontin: 1998 Situation Analysis	Probative Value Outweighed;Relevance: Marketing
PX4292	Email from Elaine Vennard to The Hallelujah Core Team re: Hallelujah Core Team Meeting Minutes – 2-27-01	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX4293	Development Request, Category: Sleep (New), Type of Project: Rx to OTC Switch, Date: March 31, 2003	Probative Value Outweighed;Relevance: Marketing
PX4294	Neurontin: 2001 Operating Plan Executive Summary	Hearsay within hearsay;Privilege;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4295	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes – May 22, 1997, Neurontin Development Team Meeting	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events
PX4296	Medical Director – Neurontin	Probative Value Outweighed;Relevance;Relevance: Marketing
PX4301	Memo from Cynthia De Luise re: Neurontin Product Maintenance and Pharmacovigilance (PMP) Team Meeting (18 October 2001) Minutes	Relevance: Foreign Labels;Relevance: Marketing
PX4315	Presentation: Neurology Group 2003 Global Operating Plan, July 26, 2002	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4323	Application to Market a New Drug, Biologic, or an Antibiotic Drug for Humane Use	Rule of Completeness
PX4324	Pfizer Consultants Meeting September 6, 2001	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX4336	Declaration of Michael Trimble, MD in Relation to Neurontin Causing Negative Mood and Behavioural Alterations, Including Suicidal	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX4360	NDA Reviewer's Guide Content and Format	No Objection
PX4364	Gabapentin NDA-FDA Questions & Requests	No Objection
PX4365	Gabapentin NDA FDA Questions-Requests Responses to FDA Requests Book 1	No Objection
PX4366	Gabapentin NDA FDA Questions-Requests Responses to FDA Requests Book 2	No Objection
PX4368	Record of FDA Contact: Review SBA and revised package insert	No Objection
PX4376	Letter from Robert Temple to Janeth Turner re: NDA 20-235, new drug application dated January 15, 1992	No Objection
PX4379	Record of FDA Contact: Discuss December 15, 1992 Advisory Committee Meeting to review the gabapentin NDA	No Objection
PX4380	Record of FDA Contact: Confirm that Parke-Davis does not plan to make formal presentations at the Advisory Committee Meeting	No Objection
PX4381	Record of FDA Contact: Obtain copy of FDA gabapentin Advisory Committee Briefing Document	No Objection
PX4382	Application to Market a New Drug for Human Use or an Antibiotic Drug for Human Use – Neurontin	Rule of Completeness
PX4383	Record of FDA Contact: Request clarification from FDA briefing document	No Objection
PX4384	Memo from O. Brandicourt re: Neurontin Marketing Assessment	Probative Value Outweighed;Relevance: Foreign Labels
PX4385	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes, November 9, 1994, Neurontin Development Strategy Meeting	Relevance
PX4386	Memo from Mi Dong to Neurontin (Anticonvulsant) Development Team re: Minutes, March 14, 1995 Neurontin Development Strategy Meeti	Hearsay;Hearsay within hearsay;Other;Privilege;Probative Value Outweighed;Relevance;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4388	Letter from Paul Leber to Janeth Turner re: supplemental new drug application dated September 13, 1996	Probative Value Outweighed;Relevance
PX4394	Email from Marino Garcia re: Key Messages	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX4397	Presentation: Neurontin Publications Subcommittee Current Status and 2002 Plans	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Marketing
PX4416	Parke-Davis Pharmaceutical Research, titled: A Double-Blind Placebo-Controlled Trial with 3 Doses of Gabapentin for Treatment of	Relevance;Rule of Completeness
PX4418	Gabapentin vs. Placebo in Patients with Neuropathic Pain. A Randomized, Double-Blind, Cross-Over, Multi-Center Study in the Nordi	Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4422	Parke-Davis Pharmaceutical Research, titled: Gabapentin Adjunctive Treatment in Patients with Bipolar Disorder	Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness
PX4425	Goadecke AG – Research and Development Report titled: A Double-Blind, Placebo-Controlled, Parallel Group, Multicenter Study of th	Relevance;Rule of Completeness
PX4429	Summary: Neurontin is not approved by the FDA for perioperative treatment of pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events;Rule of Completeness
PX4430	Parke-Davis Pharmaceutical Research Report titled: A Single-Dose, Double-Blind, Placebo-Controlled, Comparative Efficacy Study of	Relevance;Rule of Completeness
PX4440	Summary of Neurontin, Clinical Data	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX4441	Parke-Davis Pharmaceutical Research Division Report titled: Integrated Summary of Safety Information of Gabapentin Capsules	Authenticity;Rule of Completeness
PX4474	Isotretinoin (marketed as Accutane)	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX4476	MedWatch report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4487	Serious Adverse Events, Gabapentin Related Clinical Study Cases 01-01-1980-31-12-2003	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events
PX4496	Slide titled: Top 10 Uses of Neurontin	Hearsay;Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing
PX4527	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4528	Parke-Davis Memorandum: Meeting Minutes, March 14, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Irrelevant: Other indications;Probative Value Outweighed;Relevance: Marketing
PX4529	Marketing Assessment: Neurontin in Psychiatric Disorders	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4530	Parke-Davis Memorandum: Neurontin Verbatims	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4531	Neurontin 1996 SE CBU Plan	Authenticity;Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4532	Neurontin Marketing Assessments	Hearsay;Probative Value Outweighed;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4533	Neurontin Northeast CBU 1997	Hearsay; Probative Value Outweighed; Relevance: Marketing
PX4534	T196 Neurontin/Pharmaceutical Sector 1996 Operating Plan	Probative Value Outweighed; Relevance: Marketing; Rule of Completeness
PX4535	Letter to Phil Magistro from Jacki Gordon	Hearsay; Probative Value Outweighed; Relevance: Marketing
PX4536	Parke-Davis Memorandum: Selected Physician Titration Update	Hearsay; Probative Value Outweighed; Relevance: Marketing
PX4537	Parke-Davis Marketing Planning: Meeting Minutes/Action Items from Marketing Council Meeting Feb 28-March 2, 1995, Lyon, France	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX4538	Parke-Davis Memorandum: Minutes, November 14, 1995, Neurontin Development Team Meeting	Hearsay; Probative Value Outweighed; Relevance: Foreign Labels; Relevance: Marketing
PX4539	1998 Strategic Plan and A and P Allocation Grid	Hearsay; Probative Value Outweighed; Relevance; Relevance: Marketing; Rule of Completeness
PX4540	Rx List website, "Seldane," http://www.rxlist.com/cgi/generic/terfen.htm , accessed October 22, 2007.	Document Not Produced
PX4541	MediceNet.com website, "Definition of Placebo Effect," http://www.medterms.com/script/main/art.asp?articlekey=31481 , accessed October 22, 2007.	Document Not Produced
PX4542	Mayo Clinic website, http://www.mayoclinic.com/health/postherpeticneuralgia/DS00277 , accessed October 22, 2007.	Document Not Produced
PX4543	King, C., Statement Before the Committee on Governmental Affairs, Subcommittee on Oversight of Government Management, Restructuring and the District of Columbia, United States Senate, May 14, 2002 (available at http://hsgac.senate.gov/051302king.pdf) as	Authenticity; Hearsay; Hearsay within hearsay; Irrelevant; Probative Value Outweighed; Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4544	Drugs.com website, http://www.drugs.com/top200_2003.html , accessed October 22, 2007.	Authenticity;Document Not Produced;Hearsay;Irrelevant;Probative Value Outweighed
PX4545	21 CFR 202.1.	Authenticity;Hearsay
PX4546	Interoffice Memorandum from Atul Pande: Gabapentin Psychiatric Studies	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4547	Parke-Davis Memorandum: Meeting Minutes, October 18, 1994, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4548	Parke-Davis Memorandum: Meeting Minutes, January 17, 1995, Neurontin Development Team Meeting	Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness
PX4549	Parke-Davis Memorandum: Meeting Minutes, February 21, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing
PX4550	1998 Neurontin Tactics	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4551	Neurontin Publication Planning 2003 by Allison Fannon	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Rule of Completeness
PX4552	V082761	Irrelevant;Marketing;Other Indications;Probative Value Outweighed
PX4553	Parke-Davis Product Planning	Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4554	Neurontin Core Marketing Team Meeting, New York, NY	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4555	Parke-Davis Memorandum: Meeting Minutes from August 29, 1995, Neurontin Indications Decision Analysis Group Meeting	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4556	Neurontin (CI-945) Indication Publications Decision Analysis	Irrelevant;Other Indications;Probative Value Outweighed;Relevance
PX4557	Emerging Applications in the Uses of AEDs_An Educational Proposal	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4558	Northeast CBU 1997 Situation Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4560	Parke-Davis Fax from Alan Walker	Hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4562	US Department of Justice, "Warner-Lambert to Pay \$430 Million to Resolve Criminal & Civil Health Care Liability Relating to Off-Label Promotion,"available at http://www.usdoj.gov/opa/pr/2004/May/04_civ_322.htm , accessed October 14, 2007.	Authenticity;Document Not Produced;Irrelevant: Plea;Probative Value Outweighed
PX4563	Fax including the Exploratory Development Plan for Psychiatric Indications for Gabapentin	Authenticity;Hearsay within hearsay;Irrelevant: Other indications;Rule of Completeness
PX4564	Neurontin 2002 Operating Plan	Authenticity;Relevance: Marketing;Rule of Completeness
PX4565	Neurontin US Field Force Allocation	Authenticity;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4566	2001 Key Issues and Strategies	Authenticity;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4567	Share of Voice Data	Hearsay;Rule of Completeness
PX4568	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Irrelevant: Marketing;Probative Value Outweighed;Relevance;Rule of Completeness

Exhibit Number	Document Description	Defendants' Objections
PX4569	Neurontin Article Series	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4570	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Other Indications;Probative Value Outweighed;Relevance;Relevance: Marketing;Rule of Completeness
PX4571	Page from 01/09/2002 Neurontin Publications Subcommittee Plans	Hearsay;Irrelevant: Marketing;Probative Value Outweighed;Rule of Completeness
PX4572	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4574	Greenland re: gabapentin	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed
PX4575	RR-REG 740-03550, Pfizer. 3.2 Studies With Gabapentin Directed at Mechanism of Action. Confidential Pfizer Documents. DM_FILE/CI-0945 (JMF08901a).	No Objection
PX4576	Research Report	No Objection
PX4577	Blunberg, Alan. (March 30, 1992) Memo to Distribution: Gabapentin MAA – Product Profile. International Regulatory Affairs, Parke-Davis Pharmaceutical Research Division, Warner-Davis Company.p. 3.	Authenticity;Document Not Produced;Irrelevant: Foreign Labeling;Probative Value Outweighed
PX4578	Page from FDA FOI Documents for Neurontin NDA Approval	Authenticity;Document Not Produced;Rule of Completeness
PX4579	Warner-Lambert. (7/20/1987) Gabapentin versus placebo in Patients with Partial Seizures, Patient CD #205, Protocol #945-5-010. Warner-Lambert International. 1-2, 88, 96, 108-109.	Authenticity;Document Not Produced;Irrelevant: Other Events;Probative Value Outweighed

Exhibit Number	Document Description	Defendants' Objections
PX4580	Warner-Lambert. (4/8/1988) Gabapentin versus placebo in Patients with Partial Seizures, Patient CKS #213, Protocol #945-5---1. Warner-Lambert International. 154-155, 349, 352, 363.	Authenticity;Document Not Produced;Irrelevant: Other Events;Probative Value Outweighed
PX4581	Official research report from 945-15 Warner-Lambert. (5/8/1990) Adverse Event Information, Patient 945-15-01 #001 RWB. Parke-Davis Pharmaceutical Research Division, Warner-Lambert Company. 101-103, 118, 121, 127.	Authenticity;Probative Value Outweighed;Relevance
PX4582	193	Authenticity;Document Not Produced;Irrelevant;Probative Value Outweighed
PX4583	Pfizer (alpha-2-gamma) Compounds in Development, January 2002	Relevance
PX4584	Parke-Davis. (Aug 2003) Neurontin (Gabapentin) Capsules: Neurontin (Gabapentin) Tablets: Neurontin (Gabapentin) Oral Solution. Lori Murray, Senior Ed. PDR: 58 Edition: 2004: Physicians Desk Reference. Thompson PDR. Montvale, NJ. 2004. 2559.	Document Not Produced;Relevance
PX4587	Investigator's Brochure Neurontin (gabapentin) October 2001	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed
PX4590	NeP ISS	No Objection
PX4592	RR-MEMO 720-03847 (Safety Info for Study 945-177)	No Objection
PX4593	Monotherapy ISS	No Objection
PX4594	Research Report for Study 945-077	No Objection
PX4595	Research Report for Study 945-092	No Objection
PX4596	PHN ISS	No Objection
PX4599	Pediatric ISS	Rule of Completeness
PX4600	Appendix 5, Pfizer Safety and Risk Management Literature Review: Gabapentin Use Among Persons with a History of Psychotic Disorder	Irrelevant: Other indications;Probative Value Outweighed;Relevance
PX4609	Letter from Dr. Russell Katz, Director, FDA Division of Neuropharmacology to Pfizer (March 16, 2005) .	Relevance

Exhibit Number	Document Description	Defendants' Objections
PX4611	Appendix 4, Pfizer Response to EMEA, (December 14, 2005) Pfizer_Jmohan_0000479.	Authenticity;Hearsay
PX4620	RR-Reg 720-03236, NDA 20-235, Appendix B.3 (May 12, 1993)	No Objection
PX4664	RR-Reg 720-03315, NDA 20-235, Fourth Safety Update (December 15, 1992), including appendices.	No Objection
PX4678	Investigator Brochure RR-X 720-02455 dated 05-21-1992	No Objection
PX4688	Neurontin Studies	Hearsay;Relevance: Marketing
PX4689	Letter to James Parker re: NDA# 20-235 Neurontin (gabapentin capsules) MACMIS ID# 3323	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4690	Parke-Davis Memorandum: Meeting Minutes-February 25, 1997, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4691	Parke-Davis Memorandum: Minutes-April 22, 1997, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4692	Letter to William Marino re: NDA 20-235 Neurontin (gabapentin capsules) MACMIS File ID# 4162	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4693	Letter to Joan Hankin re: Advertizing MACMIS ID# 3424	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4694	Fax to B. Garofalo from L. Hayes re: Gabapentin for Treatment of Pain Consultants Meeting, September 28, 1995; Boston, MA	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4695	Warner-Lambert Company Responses to Questions 1-7 and Specifications 12, 13 and 14	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4696	Summary of teleconference	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Other Events
PX4697	RR 720-02480	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX4698	Research Report_No:RR-MEMO 720-03991	No Objection
PX4699	Letter to James Parker re: NDA# 20-235 Neurontin (gabapentin capsules) MACMIS ID# 3323	Hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4700	Pre-NDA Meeting Summary	No Objection
PX4701	Letter to Lesley Frank re: MACMIS File ID #4162 NDA-20-235, Neurontin (gabapentin capsules)	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4702	Executive Summary- Suicide Rates in Neurontin-treated Population Groups	Hearsay;Irrelevant: Other indications
PX4703	Research Study report: An open-label multicenter study of the safety and efficacy of gabapentin as monotherapy or add-on therapy in the long-term treatment of epileptic seizures	Hearsay;Irrelevant: Other indications;Probative Value Outweighed;Relevance: Foreign Labels
PX4704	JONCA BULL STATEMENT	Probative Value Outweighed;Relevance
PX4705	WARNER-LAMBERT TO PAY \$430 MILLION	Authenticity;Hearsay;Irrelevant: Plea;Probative Value Outweighed
PX4706	WLC_JTURNER_000284	Relevance
PX4707	Antiepileptic Drugs for Treatment of Neuropathic Pain	No Objection
PX4708	Charles Dellinger vs. Pfizer, Summons to Proceed before a Magistrate Judge	Hearsay;Hearsay within hearsay;Other;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events
PX4709	IND60622_MISC_002_0011	No Objection
PX4710	Suicide Clinical Communications Letter	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4711	NDA20235_MISC_002_0080	No Objection
PX4712	FDA FOI Documents for Neurontin NDA Approval	Hearsay;Hearsay within hearsay;Non-final agency finding;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX4713	FDA Contact Report	Hearsay;Hearsay within hearsay;Relevance: New Warning
PX4714	Letter to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS # 10174	Probative Value Outweighed;Relevance: Marketing
PX4715	Potential for Drug Abuse with Gabapentin: A Post-Marketing Safety Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX4716	Response to FDA regarding suicide and suicide attempt in Neurontin (gabapentin) clinical trials-Phase 1 Studies	No Objection
PX4717	Fax transmittal of letter to Lucy Castro re: Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4718	Research Report No:RR 720-04229	No Objection
PX4719	Email from Michelle Clausen re: Neurontin-med info letter	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning;Rule of Completeness
PX4720	NDA21397_MISC_008_0085	Hearsay
PX4721	RR 720-03856	No Objection
PX4722	Letter to Sherry Danese re: Advertising and Promotion	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4723	AER_SOURCE_0145583	Hearsay;Hearsay within hearsay;Relevance: Other Events
PX4724	Pfizer Meeting Minutes Summary	Irrelevant: Other indications
PX4725	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Hearsay
PX4726	Parke-Davis Worldwide Regulatory Affairs FDA Contact	Hearsay;Relevance: Other Events
PX4727	JANET WOODCOCK STATEMENT	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed
PX4728	Pfizer Drug Safety (Ann Arbor) Product Reference Guide Gabapentin CI#0945 NDA#20-235 International Birth Date (IBD) February 5, 1993	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX4729	Letter to Russell Katz re: Request for Information-Response to FDA suicidality request	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning
PX4730	GABITRIL PUBLIC HEALTH ADVISORY	Hearsay;Irrelevant: Other Events;Probative Value Outweighed
PX4731	DAVID FRANKLIN AFIDAVIT – MAY 19, 2003	Authenticity;Document Not Produced;Hearsay;Irrelevant: Plea;Probative Value Outweighed
PX4732	PFIZER_PSUR_0002058	No Objection
PX4733	PFIZER_PSUR_0002049	No Objection
PX4734	DEAR DR. LETTER – ELDEPRYL	Authenticity;Document Not Produced;Hearsay;Irrelevant: Other Events;Probative Value Outweighed
PX4735	ISOTRETINOINHCP	Hearsay;Irrelevant: Other Events;Probative Value Outweighed
PX4736	LYRICA_2005	Authenticity;Document Not Produced;Hearsay;Irrelevant: Other Events
PX4737	Section 3.1 (Background) for NDA 21-397	Hearsay within hearsay
PX4738	Research Report No: RR 740-03075	Relevance
PX4739	Neurontin Warning Label	Relevance
PX4741	Research Report No: RR 720-04174	Relevance
PX4743	Research Report No: RR 720-04231	Relevance
PX4744	Research Report No: RR 720-04232	Relevance
PX4745	Research Report No: RR 720-03893	Relevance: Other Events
PX4746	Research Report No: RR-REG 720-30135	No Objection
PX4747	Research Report No: RR 720-03891	Relevance: Other Events
PX4748	Research Report No: RR 740-03253	Relevance: Other Events
PX4749	Research Report No: RR 744-00238	No Objection
PX4750	Research Report No: RR-X 720-03362	No Objection
PX4751	Research Report No: RR-X 720-03381	No Objection
PX4752	Research Report No: RR-X 720-03480	No Objection
PX4753	Dear Healthcare Professional Letter from Bill Sigmund	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX4754	Fax sent to James Parker re: NDA#20-235 Neurontin (gabapentin) capsules MACMIS ID# 3224	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4755	Research Report No: RR 720-04363	Relevance: Other Events
PX4756	Parke-Davis Memorandum: Gabapentin Analgesia Studies	Relevance
PX4757	Response to FDA regarding suicide and suicide attempt in Neurontin (gabapentin) clinical trials and postmarketing surveillance	No Objection
PX4758	Postmarketing Experience Report according to CIOMS II April 1993 to May 22, 1995	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events
PX4759	Periodic Safety Update Report Gabapentin February 1, 2003 through January 31, 2004	Relevance: Foreign Labels;Relevance: Other Events
PX4760	Email from Manini Patel to Tina Ho re: Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels
PX4761	Email from Tina Ho to Steve Baldwin re: Neurontin and Suicide	Hearsay within hearsay
PX4762	Report on Gabapentin and Suicide	Hearsay;Hearsay within hearsay;Probative Value Outweighed
PX4763	Research Report No: RR 720-03894	Relevance
PX4764	Research Report No: RR 740-02959	Relevance: Other Events
PX4765	Research Report No: RR 4192-0166	Relevance
PX4766	Research Report No: RR 4301-00124	Relevance
PX4767	Research Report No: RR 720-02816	No Objection
PX4768	Research Report No: RR 720-02837	No Objection
PX4769	Research Report No: RR 720-02883	No Objection
PX4770	Research Report No: RR 720-02993	No Objection
PX4771	Research Report No: RR 720-03498	No Objection
PX4772	Research Report No: RR-REG 720-03732	No Objection
PX4773	Response to FDA regarding suicide and suicide attempt in Neurontin (gabapentin) clinical trials and postmarketing surveillance	No Objection
PX4812	720-02957.pdf (Integrated Summary of Safety of Gabapentin)	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX4844	FDA Amicus Brief regarding Neurontin and Suicidality dated July 1, 2008	Authenticity;Hearsay;Irrelevant: New Warning;Probative Value Outweighed
PX4846	Pfizer Slide presentation to Columbia University Antiepileptic Drug Meeting dated June 2, 2008	No Objection
PX4848	Email sent to Elizabeth Mutisya from John Marino re: POPP Study	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX4849	Neurontin 1996 SE CBU Plan	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4850	Parke-Davis Memorandum: Reporting of Neurontin Indication Publications Analysis	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness
PX4851	8/2/2001 Neurontin Field Force Allocation	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4852	Email sent to Michelle Mays from Leslie Tive re: April PSC meeting action report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4853	Neurontin 2001 US Operating Plan	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events
PX4854	Letter to Andrea Garrity re: NDA #s 20-235, 20-882 Neurontin (gabapentin) MACMIS # 10174	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4855	Email sent from John Marino re: Neurontin, Boston Globe Report, November 25, 2002	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX4856	Neurontin Publications Subcommittee Current Status and 2002 Plans	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4857	Email sent from Larry Alphs re: Minutes from NeP expert panel	Hearsay within hearsay;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX4858	Fax including a copy of the Meeting Minutes of the Core Marketing Team Meeting with conclusions and action items	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4859	Conclusions and Action Items: Neurontin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events
PX4860	Neurontin Core Marketing Team Meeting in New York, NY	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4861	Parke-Davis Memorandum: Meeting Minutes from August 29, 1995 Neurontin Indications Decision Analysis Group Meeting	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4862	Email sent from Francie Kivel re: Neurontin Indication Publications Analysis Report (includes Appendices)	Hearsay;Other;Probative Value Outweighed;Relevance;Rule of Completeness
PX4863	Fax transmittle of Exploratory Development Plan for Psychiatric Indications for Gabapentin	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing
PX4864	Email sent from Elizabeth Mutisya re: GBP-post amputation pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events
PX4865	Email sent from John Marino re: Neurontin GDRC Presentation	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX4866	AED Advisory Board Presentations by Mike Valentino	Authenticity;Relevance
PX4867	Neurontin Publication Planning 2003 by Allison Fannon	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4868	USPTO Patent Full-Text and Image Database	Hearsay;Hearsay within hearsay;Relevance
PX4869	Gabapentin PPT slides	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events
PX4870	Email sent to John Marino from Steve Piron re: GDRC Meeting Minutes for September 19, 2001	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Rule of Completeness
PX4871	Neurontin 2002 Operating Plan PPT Slides	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Relevance: Other Events
PX4872	Neurontin PPT slides	Hearsay;Hearsay within hearsay
PX4873	Neurontin (CI-945) Indication Publications Decision Analysis	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4874	Email sent from John Marino to Elizabeth Mutisya re: POPP Study	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4875	Email sent from David Probert re: Publication of Key Studies	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness
PX4876	Email sent from Judy Brown re: 25 and 26 Studies	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4877	Email sent to Leslie Tive from John Marino re: 224 Study	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing;Rule of Completeness
PX4878	Pfizer Consultants Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4879	Expert Meeting Report: development of compounds for neuropathic pain	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Other Events
PX4880	Global Development Review Committee Meeting Minutes	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4881	Letter to Phil Magistro from Jacki Gordon	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4882	Parke-Davis Memorandum: Neurontin Marketing Assessments	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4883	Interoffice Memorandum from Atul Pande: Gabapentin Psychiatric Studies	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4884	Parke-Davis Memorandum: Meeting Minutes, October 18, 1994, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4885	Parke-Davis Memorandum: Minutes, January 17, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4886	Parke-Davis Memorandum: Meeting Minutes, February 21, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4887	Parke-Davis Memorandum: Meeting Minutes, March 14, 1995, Neurontin Development Team Meeting	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4888	Parke-Davis Memorandum: Meeting Minutes, November 14, 1995, Neurontin Development Team Meeting	Hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4889	1998 Neurontin Tactics	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4890	Articles on Antiepileptic Drug Use in Epilepsy and Other Disorders Project Staus as of July 18, 1997	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4891	Invoices #: 7094, 7093, 7014, 7065, 7064	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4892	Neurontin Northeast CBU 1997	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4893	Presentation: ACE Inhibitor South East Share	Hearsay within hearsay;Relevance: Marketing;Relevance: Other Events
PX4894	Neurontin 1996 SE CBU Plan	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4895	1998 Strategic Plan and A and P Allocation Grid Neurontin	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4896	Parke-Davis Memorandum: Selected Physician Titration Update	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX4897	Parke-Davis Memorandum: Neurontin Verbatims	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX4898	Northeast CBU 1997 Situation Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Other Events
PX4899	Emerging Applications in the Uses of AEDs, An Educational Proposal	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4900	Neurontin Article Series	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX4901	Parke-Davis Memorandum: Neurontin Marketing Assessment (included)	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels;Relevance: Marketing
PX4902	Parke-Davis Memorandum: Minutes/Action Items from Marketing Council Meeting February 28 – March 2, 1995, Lyon, France	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX4903	Marketing Assessment: Neurontin in Psychiatric Disorders	Authenticity;Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels;Relevance: Marketing
PX4904	Parke-Davis Memorandum: Neurontin Details	Hearsay;Relevance: Marketing;Rule of Completeness
PX4905	Emerging Applications in the Use of AEDs	Hearsay;Relevance
PX4906	Research Report No: RR 4192-0166	Rule of Completeness
PX4907	Behavioural Disturbance with Gabapentin by Professor Michael Trimble	Hearsay;Hearsay within hearsay
PX4908	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Authenticity
PX4909	Periodic Report: Drug Safety Gabapentin / Neurontin	Hearsay;Hearsay within hearsay;Relevance: Foreign Labels;Relevance: Other Events
PX4910	Email sent from Charlie Taylor re: Neurontin pharmacology (re: France)	No Objection
PX4911	RR 740-02866	Authenticity;Rule of Completeness
PX4912	RR 740-03545	No Objection
PX4928	PMP Minutes (16 Jan 03) [Pfizer_Scristo_0000513 to 19]	No Objection
PX4929	May 4, 2004 E-mail from Greg Gribko to Douglas Kargman [Pfizer_Ggribko_0002762]	Probative Value Outweighed;Relevance: Other Events
PX4930	Neurontin label (revised September 2003)	No Objection
PX4931	RMWG Minutes (16 Jan 02) [Pfizer_Lcastro_0076898 to 900]	No Objection
PX4932	RMWG Minutes (24 Sep 01) [Pfizer_Lknapp_0025486 to 90]	No Objection
PX4933	RMWG Minutes (12 Jun 01) [Pfizer_Rglanzman_0036788 to 92]	No Objection
PX4934	PMP Labeling CWG Minutes (4 Mar 04) [Pfizer_Lcastro_0084739 to 41]	No Objection
PX4935	PMP Labeling CWG Minutes (1 Mar 04) [Pfizer_Mevertz_0015747 to 48]	No Objection
PX4937	PMP Labeling CWG Minutes (25 Jul 02) [Pfizer_Rglanzman_0166311 to 14]	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX4939	Periodic Safety Update Report (Gabapentin), United Kingdom, February 1, 2003 through January 31, 2004 [Pfizer_Ggribko_0002764 to	Relevance;Rule of Completeness
PX4949	Neurontin label (December 30,1993)	No Objection
PX4951	Neurontin label (revised July 2001)	No Objection
PX4952	RR-REG 720-03322 (December 14,1993)	No Objection
PX4953	RR-REG 720-03132 (December 30,1992)	No Objection
PX4954	RR-REG 720-03079 (May 29,1992)	No Objection
PX4957	""Gabapentin and Suicide"" by Jeffrey Mohan (October 2005)	Hearsay
PX4958	""Gabapentin and Suicide"" by Tina Ho (August 2004)	No Objection
PX4959	Neurontin label (revised December 2005)	No Objection
PX4963	E-mail from Lesia Tontisakis to Michael Campbell (January 16, 2003, 4:19 PM) [Pfizer_THO_0001634]	Relevance
PX4964	E-mail from Cathy Sigler to Tina Ho (January 9, 2003, 4:54 PM) [Pfizer_THO_0001633]	Relevance
PX4969	February 2000 Review of the Neuropsychiatric Adverse Events Reported in Association with the Use of Gabapentin During the Period 1: January 1996 to 31 December 1999, Warner-Lambert's Drug Safety Surveillance [Pfizer_Mevertz_00131185 to 202]	Rule of Completeness
PX4970	PMP Minutes (17 Oct 02) [Pfizer_Lcastro_0015365 to 71]	No Objection
PX4974	E-mail from James Leonard to Elizabeth Garofalo (February 8,2000) Pfizer_Lknapp_0135257 to 58	Relevance
PX4980	Pfizer Worldwide Development Safety and Risk Management: Master Document on Pharmacovigilance (August 2005) Pfizer_Eluczak_0067016-0067016	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX4981	Pfizer Worldwide Development Safety and Risk Management: Master Document on Pharmacovigilance (October 2004) Pfizer_Eluczak_0067211- 0067255	No Objection
PX4989	PMP Minutes (19 Jul 01) [Pfizer_Lcastro_0015331 to 38]	No Objection
PX4991	Tabular Summary of the Indications and Medical History in Cases Reporting Patients Who Committed Suicide or Attempted Suicide While Receiving Gabapentin, by Jigna Shaw, Pharm. D., July 28, 2006 [Pfizer_Mevertz_0091472 to 78]	Relevance
PX4993	E-mail from Linda LaMoreaux to Julia Su (November 6, 2003, 2:02 PM) [Pfizer_Jsu_0026449]	No Objection
PX4994	E-mail from Bruce Parsons to Claire Wohlhuter (October 14, 2003, 4:04 PM) [Pfizer_Bparsons_0134014]	No Objection
PX4995	E-mail from Suzanne Doft to Jill Bruzga, et al. (October 9, 2003, 5:07 PM) [Pfizer_Sdoft_0056764]	Relevance
PX4997	E-mail from Ed Whalen to Claire Wohlhuter, et al. (October 9, 2003, 7:08 PM) [Pfizer_Sdoft_0055890]	No Objection
PX5028	Neurontin (gabapentin) Pharmacology-General mechanism of drug action	Hearsay
PX5029	Comparison of pharmacology of gabapentin and vigabatrin	Hearsay
PX5030	Report: Mechanisms of Action of Gabapentin by Charles Taylor	Authenticity;Hearsay
PX5031	Report: Mechanisms of Action of Gabapentin by Charles Taylor (draft)	Authenticity;Hearsay
PX5032	The Biology and Pharmacology of Calcium Channel (alpha-2-gamma) Proteins (Presentation)	No Objection
PX5033	Neurontin Annual Report (August 19, 2003-August 19, 2004)	Hearsay within hearsay
PX5034	Executive Summary: Mechanisms of Action Data-Sharing Meeting	Authenticity;Hearsay
PX5057	Research Report 720-03 850 (March 19, 1999) (social phobia study)	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX5063	Research Report 720-0385 1 (April 9, 1999) (panic disorder study)	No Objection
PX5083	PFOENIX	Authenticity;Hearsay;Hearsay within hearsay
PX5084	Memorandum: Committee Mailing- Neurontin (Gabapentin) NDA 20-235	No Objection
PX5101	Parke-Davis Memorandum: Gabapentin MAA-Product Profile	Authenticity
PX5102	USMI Standard Monthly Reports re: US Medical Information Standard Monthly Reports	Hearsay;Probative Value Outweighed;Relevance: Other Events
PX5105	Suicide Clinical Communications Letter	Authenticity;Hearsay within hearsay
PX5106	United States Patent	Hearsay;Hearsay within hearsay
PX5108	Email sent from John Marino re: Neurontin labeling, Ground rules and Agenda, Meeting, May 22	Hearsay;Hearsay within hearsay
PX5109	5/24/2001 Email from Pande to Distribution	No Objection
PX5112	Letter to Douglas Throckmorton, Russell Katz, and Bob Rappaport from Jonathon Parker re: Lyrica (pregabalin) Capsules, etc.	Relevance
PX5114	10/31/2001 Email from Piron to Doft et al	Hearsay within hearsay;Rule of Completeness
PX5115	Pain BOP	Hearsay;Probative Value Outweighed;Relevance
PX5116	BOP Labeling_Neurontin	Hearsay
PX5121	Gabapentin PPT slides	No Objection
PX5123	Gabapentin PPT slides	Hearsay within hearsay;Rule of Completeness
PX5124	Gabapentin: Pharmacology Written Summary	No Objection
PX5127	PPT Presentation Slides: Clinical Development in the Slipstream of Gabapentin	No Objection
PX5128	Neurontin Usage PPT slides	Hearsay;Relevance: Marketing
PX5129	Query after 1 st Review Gabapentin	Hearsay
PX5133	Gabapentin Mechanism Work Group Team Chapter	Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5135	Email sent from Drusilla Scott re: Neurontin PHN SNDA; status and labeling	Hearsay;Rule of Completeness
PX5144	Email sent from Manfred Hauben re: FDA request for teleconference with Pfizer to discuss safety concerns with Neurontin	Hearsay;Relevance
PX5145	Neurontin Medical Initiatives for 2002 PPT slides	Hearsay;Relevance: Marketing
PX5149	United States Patent	Hearsay;Hearsay within hearsay
PX5150	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX5150	Parke-Davis Memorandum: Neurontin Marketing Assessment	Hearsay within hearsay;Relevance: Marketing
PX5154	Clinical Expert Report and Written Summary of Clinical Studies: Gabapentin for the Treatment of Neuropathic Pain	Hearsay within hearsay
PX5155	Investigator's Brochure Addendum for Epilepsy Neurontin (Gabapentin), May 2002	Hearsay within hearsay
PX5160	Gabapentin and Suicide Report	Hearsay within hearsay
PX5163	Email sent to Leslie Tive from Angela Crespo re: Revised draft of publication for 945-224	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX5164	Research Report No: RR-MEMO 720-30106	No Objection
PX5171	Suicide Rates in Neurontin Treated Populations	Hearsay;Hearsay within hearsay
PX5173	Mechanisms of Action of anticonvulsants	Foundation;Hearsay
PX5174	Email sent to Michelle Mays from Leslie Tive re: Neurontin Information	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5185	Psychiatrist Use of Anticonvulsants Discussion Guide	Hearsay;Relevance;Relevance: Marketing
PX5187	PPT slides	Foundation;Hearsay;Rule of Completeness
PX5188	PPT slides Gabapentin	Hearsay;Hearsay within hearsay;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5190	Periodic Safety Update Report Gabapentin February 1, 1998 through January 31, 2003	Hearsay within hearsay
PX5193	Neurontin PPT Presentation by Michelle Clausen and Yuan Wang	Hearsay
PX5198	Adverse Event Reporting Rate (PT)	Hearsay;Hearsay within hearsay
PX5200	Drugs in Clinical Development for Epilepsy	Hearsay;Relevance
PX5201	Project Operating Plan (POP)	Hearsay;Relevance
PX5202	Review of the Neuropsychiatric Adverse Events Reported in Association with the Use of Gabapentin during the Period January 1, 1996 to December 31, 1999	No Objection
PX5203	Increase Frequency Analysis	Hearsay;Hearsay within hearsay;Relevance;Rule of Completeness
PX5204	Neurontin (gabapentin) Tablets Single Moiety Increased Frequency Analysis NDA#20-882	Hearsay;Hearsay within hearsay;Relevance
PX5205	Neurontin Suicidality Overview Table	Foundation;Hearsay within hearsay;Relevance;Rule of Completeness
PX5210	Pfizer Memorandum: Gabapentin Product Maintenance and Pharmacovigilance (PMP) Labeling Core Working Group (CWG)	No Objection
PX5211	Pfizer Memorandum: Gabapentin Product Maintenance and Pharmacovigilance (PMP) Labeling Core Working Group (CWG)	No Objection
PX5212	9/13/2001 Email from Mutisya to Murphy et al	Probative Value Outweighed;Relevance
PX5213	Email sent from Kirk Taylor re: GBP-post amputation pain	Hearsay;Probative Value Outweighed;Relevance
PX5215	Neurontin: Safety Surveillance	No Objection
PX5216	Email sent from Angela Crespo re: Backonja	Hearsay;Hearsay within hearsay;Relevance: Marketing
PX5219	Adverse Event Reporting Rate (PT)	Hearsay;Hearsay within hearsay;Relevance
PX5220	FDA Contact Report	Hearsay;Relevance
PX5223	Costart Report	Foundation;Hearsay

Exhibit Number	Document Description	Defendants' Objections
PX5224	Email sent from Kay Samulak re: Gabapentin MEB assessment	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events
PX5226	MedWatch Mfr Report #041-0912-860001-01	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events
PX5227	Email sent from Julia Su re: Neurontin and Suicide	Hearsay;Hearsay within hearsay
PX5228	Email sent from Tina Ho re: Neurontin and Suicide	Hearsay;Hearsay within hearsay
PX5230	MedWatch Mfr Report #001-0945-900031-00	Hearsay;Hearsay within hearsay;Relevance: Other Events
PX5231	MedWatch Mfr Report #001-0945-940103-00	Hearsay;Hearsay within hearsay;Relevance
PX5234	Narrative Line Listing AER Number: 032-0945-M0000010	Hearsay;Hearsay within hearsay;Relevance
PX5235	Narrative Line Listing AER Number: 001-0945-940009	Hearsay;Hearsay within hearsay;Relevance
PX5239	Serious Adverse Events Gabapentin Clinical Study Cases 01/01/1980-15/10/2003	Hearsay;Hearsay within hearsay;Relevance: Other Events
PX5240	Letter from Jovi Bacud-van der Kallen re: Periodic Safety Update Report (PSUR) February 1, 1998 through January 31, 2003 Neurontin (gabapentin)	Hearsay;Hearsay within hearsay;Relevance;Relevance: Other Events
PX5242	Hallucinations and Gabapentin Report (draft)	Hearsay;Hearsay within hearsay;Relevance
PX5247	MedWatch Mfr Report #001-0945-880004-01	Hearsay;Hearsay within hearsay;Relevance
PX5249	Warner-Lambert Company WAERS Composite Report Event No: 13089	Hearsay;Hearsay within hearsay;Relevance
PX5250	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance
PX5251	Warner-Lambert Company WAERS Composite Report Event No: 14362	Hearsay;Hearsay within hearsay;Relevance
PX5252	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance
PX5253	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance
PX5254	Warner-Lambert Company WAERS Composite Report Event No: 22288	Hearsay;Hearsay within hearsay;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5255	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance
PX5256	Warner-Lambert Company WAERS Composite Report Event No: 14801	Hearsay;Hearsay within hearsay;Relevance
PX5257	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Relevance
PX5258	Parke-Davis Memorandum: Follow-up Adverse Event Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5259	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5260	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5261	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5262	Warner-Lambert Company WAERS Composite Report Event No: 25691	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5263	Warner-Lambert Memorandum: Routing Slip: WAERS Reports	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5264	Statprobe, Inc.data Clarification Form-Gabapentin CI945-94	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5265	Warner-Lambert Adverse Event Report Form	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX5266	Parke-Davis Memorandum: Initial Adverse Event Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5267	Letter addressed to David Dunner re: study of Gabapentin in Bipolar Disorder	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX5268	Letter addressed to Lesley Frank re: MACMIS File ID #4162 NDA-20-235, Neurontin (gabapentin capsules)	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5269	Research Report No: RR-REG 720-30077	No Objection
PX5270	Research Report No: RR-REG 720-30134	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX5271	Research Report No: RR 720-30154	Relevance
PX5272	Research Report No: RR-REG 740-03550	No Objection
PX5275	Medical Mania	Foundation;Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5279	Letter from William Sigmund re: Neurontin	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Rule of Completeness
PX5283	Assessing New Clinical Uses for Neurontin: A Meeting for Neurology and Psychiatry Consultants	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5285	Parke-Davis Memorandum: Selected Physician Titration Analysis	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5287	PD Marketing Assessment Neurontin in Psychiatric Disorders	Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels
PX5289	Record of FDA Contact	Relevance
PX5290	Record of FDA Contact	No Objection
PX5291	Record of FDA Contact	Hearsay;Hearsay within hearsay
PX5292	Record of FDA Contact	Hearsay;Hearsay within hearsay
PX5293	Record of FDA Contact	Hearsay;Hearsay within hearsay
PX5294	Record of FDA Contact	Hearsay;Hearsay within hearsay
PX5296	Record of FDA Contact	Hearsay;Hearsay within hearsay
PX5299	1000 Days of NEURONTIN	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5300	2	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5301	945-186	Hearsay;Relevance
PX5303	A SUMMARY OF MECHANISTIC HYPOTHESES OF GABAPENTIN	No Objection

Exhibit Number	Document Description	Defendants' Objections
	PHARMACOLOGY	
PX5309	ALPHS VIDEO	Authenticity;Foundation;Hearsay;Probative Value Outweighed
PX5310	An Update on the Possible Mechanisms of Action of Gabapentin	No Objection
PX5311	ARISGDatabase	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed
PX5313	Audio Alphs	Authenticity;Foundation;Hearsay;Irrelevant;Probative Value Outweighed
PX5314	Audio Pande	Authenticity;Irrelevant;Probative Value Outweighed
PX5315	Audiofiles	Authenticity;Irrelevant;Probative Value Outweighed
PX5316	Betsy	Authenticity;Irrelevant;Probative Value Outweighed
PX5318	C O N F I D E N T I A L	No Objection
PX5319	Clary Audio File	Authenticity;Hearsay;Probative Value Outweighed
PX5320	CLINICAL PLAN-LT#1-MEDICAL	Hearsay
PX5323	CMMS	Authenticity;Relevance;Relevance: Foreign Labels
PX5324	Crognale CMMS and Sherlock Notes	Authenticity;Irrelevant;Probative Value Outweighed
PX5325	Crognale NDC Data	Authenticity;Hearsay;Irrelevant;Probative Value Outweighed
PX5326	CTD-pev[g	Hearsay;Probative Value Outweighed;Relevance;Rule of Completeness
PX5330	Declaration of Joshua Peteet Dated April 14, 2009	Hearsay;Hearsay within hearsay;Relevance;Relevance: Marketing
PX5334	FDADatabase	Authenticity;Hearsay;Probative Value Outweighed
PX5336	For the month of March, Neurontin remained one of the top 10 requested products in US Medical Information, with approximately	Hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness

Exhibit Number	Document Description	Defendants' Objections
PX5338	FW: **REMINDER DUE MONDAY** ACTION REQUIRED: MOA Publications Working Group please review – Heteroaromatic Side-chain Analogs manuscript – Due: 12/6	Hearsay;Hearsay within hearsay
PX5341	Fw: Professor Martin Koltzenburg question	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX5343	GABA Modulator	Hearsay;Hearsay within hearsay
PX5344	Gabapentin	Hearsay
PX5349	GBP FOI DOCUMENTS	Hearsay;Hearsay within hearsay
PX5351	Goldman CMMS and Sherlock Notes	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant;Probative Value Outweighed
PX5352	Goldman NDC Data	Authenticity;Irrelevant
PX5353	IMSData	Authenticity;Irrelevant
PX5354	Investigator Brochure	Hearsay;Probative Value Outweighed;Relevance;Relevance: Foreign Labels
PX5357	LABELING-LT#4-MAJOR MARKETS-USA	No Objection
PX5358	LEGAL-LT#4-MAJOR MARKETS-USA	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX5359	LUCY CASTRO DAY FILE 2002	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5361	Pfizer Neurontin Medical Lit Database	Authenticity
PX5362	MISSING NARRATIVES	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Other Events
PX5364	Narratives of Adverse Events Occurring During Clinical Pharmacology and Clinical Studies Considered Serious by	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX5365	NDC	Authenticity

Exhibit Number	Document Description	Defendants' Objections
PX5373	Neurontin Capsules, Tablets and Oral Solution	Hearsay;Probative Value Outweighed
PX5378	NEURONTIN INVESTIGATIONAL BROCHURE-LT#1-MEDICAL	No Objection
PX5381	Neurontin Monthly US Performance Report	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Rule of Completeness
PX5386	No Slide Title	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5388	No Slide Title	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5389	No Slide Title	Hearsay;Probative Value Outweighed;Relevance
PX5392	Objective: With the post marketing use of gabapentin with patients other than epilepsy it is important to identify whether these	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5394	MERLIN	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant
PX5395	Pande Audio	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant
PX5397	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1996	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5398	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1998	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5399	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-1999	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5400	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2001	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5401	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2002	Hearsay within hearsay;Probative Value Outweighed;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5402	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2003	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5403	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2004	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5404	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12/31/2005	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5405	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12/31/2006	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5406	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2007	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5407	Pfizer Inc – PFE Annual report which provide a comprehensive overview of the company for year ending 12-31-2008	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5408	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-28-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5409	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5410	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 03-31-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5411	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 04-01-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5412	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 06-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5413	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 07-01-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5414	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 07-02-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5415	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 09-28-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5416	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 09-29-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5417	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 09-30-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5418	Pfizer Inc – PFE Quarterly report which provides a continuing view of the company's financial position for quarter ending 10-01-2	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5423	PMO-Pillar Training	Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5424	PMP	Hearsay within hearsay;Probative Value Outweighed;Relevance: Foreign Labels
PX5426	PowerPoint Presentation	Hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing;Relevance: Other Events
PX5432	RE: GABAergic & a2d compounds	No Objection
PX5434	RE: GBP – post amputation pain	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX5436	RE: names of reviewers for Neurontin publications	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events

Exhibit Number	Document Description	Defendants' Objections
PX5437	RE: names of reviewers for Neurontin publications	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5438	Re: National Public Radio- NEURONTIN Story to be aired TONIGHT	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX5440	RE: Neurontin FDA Response	Hearsay;Hearsay within hearsay;Relevance
PX5441	RE: Neurontin PHN sNDA	Hearsay;Hearsay within hearsay
PX5449	RR Database	Authenticity;Hearsay;Hearsay within hearsay;Probative Value Outweighed
PX5450	SAFETY	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5451	ShelockDatabase	Authenticity;Hearsay;Hearsay within hearsay;Irrelevant
PX5452	SOP 6-010	Relevance;Relevance: Other Events
PX5453	Study Number	Hearsay;Hearsay within hearsay;Relevance
PX5651	UNTITLED	Relevance;Relevance: Foreign Labels
PX5652	UNTITLED	Hearsay;Hearsay within hearsay;Relevance
PX5653	Verispan	Authenticity;Hearsay;Hearsay within hearsay;Relevance
PX5654	""All it takes is one"" audio file	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5655	""Neurontin Push"" audio file	Authenticity;Hearsay;Probative Value Outweighed;Relevance: Marketing
PX5656	""Liason Use"" audio file	Authenticity;Irrelevant;Marketing;Probative Value Outweighed
PX5657	Letter to Robert Gibbons From J.T. Coyle Dated 2/2/2009	Hearsay
PX5658	Letter to Robert Gibbons From J.T. Coyle Dated 4/27/2009	Hearsay

Exhibit Number	Document Description	Defendants' Objections
PX5659	Letter from Robert Gibbons to the editor of Archives of General Psychiatry dated 3/15/2009	Hearsay
PX5661	Neurontin Periodic Report 8/19/2005 to 8/18/2006	Hearsay;Relevance
PX5662	PPT Presentation_Tetrabenazine New Drug Application 21-894	Hearsay;Relevance
PX5664	Sentencing of case_USA v. Warner-Lambert Company, LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX5665	September 2008 FDA Health Case Alert on Phenergan (Promethazine)	Hearsay;Hearsay within hearsay;Irrelevant
PX5666	Internet Article_Suicidal Thoughts and Behavior: Antiepileptic Drugs-Full Version	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: New Warning
PX5667	Research Report_Supplemental Data Gabapentin Receptor (alpha-2-delta)-1 Is a Neuronal Thrombospondin Receptor Responsible for Excitatory CNS Synaptogenesis	Authenticity;Hearsay;Hearsay within hearsay;Relevance
PX5669	PLEA AGREEMENT	Hearsay;Probative Value Outweighed;Relevance: Marketing;Relevance: Plea
PX5670	U.S. Food and Drug Administration Internet Article_Suicidal Behavior and Ideation and Antiepileptic Drugs	Hearsay;Relevance: New Warning
PX5671	Settlement Agreement with Pfizer	Hearsay;Irrelevant: Other Events;Probative Value Outweighed;Relevance: Plea
PX5672	Judgement of case_USA v. Warner-Lambert Company, LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea
PX5673	Letter sent from Michael Sullivan_re: Warner-Lambert Company LLC	Hearsay;Probative Value Outweighed;Relevance: Plea
PX5674	Parke-Davis Pain AD Board	Hearsay;Relevance
PX5675	Antiepileptic Drug Trials III 3/14/96	Hearsay
PX5676	Neurobehavioral Sciences Working Group	Authenticity;Hearsay
PX5677	5/7/99 Intramed Fax	Hearsay;Relevance
PX5678	7/31/95 Neurontin Marketing Assessment	Probative Value Outweighed;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX5679	Email sent from Allison Fannon_re: Gabapentin Chapter Review-Treatment of Epilepsy	Relevance
PX5680	Neurontin 2004 US Strategic Clinical Operating Plan Draft	Hearsay;Probative Value Outweighed;Relevance
PX5681	Neurontin 2002 Operating Plan	Hearsay;Probative Value Outweighed;Relevance;Relevance: Other Events
PX5682	Neurontin Speaker Training 8/10/2002	Relevance
PX5683	Presentation Slides	Hearsay;Hearsay within hearsay;Relevance
PX5684	Email sent to Allison Fannon; Timothy Hsu from Claire Wohlhuter_re: Joint NeP/Fibro/LCP	Other Indications
PX5685	Neurontin National Meeting Roster	Authenticity;Hearsay;Relevance
PX5686	Neuropathic Pain Advisory Board Meeting_General Sessions and Workshops Summary	Hearsay;Relevance
PX5687	Letter addressed to Allison Fannon_re: Progress in Pain Management for Primary Care Physicians	Authenticity;Relevance
PX5688	Neurontin Action Plan_POA2-2004	Hearsay within hearsay;Probative Value Outweighed;Relevance: Marketing
PX5689	Neurontin POA Goals Marketing Contest Flyer	Hearsay;Relevance
PX5690	Email sent from Susanne Batesko_re: Neurontin Publications Report	Relevance;Relevance: Other Events
PX5691	Final Report_Pfizer Italia S.r.l._Double-Blind, placebo controlled, randomized, multicenter study on the efficacy and safety of gabapentin (Neurontin) as adjuvant analgesic in neuropathic pain in patients with malignancies_Protocol No. 945-420276	Relevance
PX5692	Clinical Expert Report_Neurontin Neuropathic Pain	Hearsay within hearsay
PX5693	Presentation Slides_Neurontin Global Goal Alignment 2003	Relevance;Relevance: Foreign Labels

Exhibit Number	Document Description	Defendants' Objections
PX5694	Email sent from Lloyd Knapp_re: QOL abstract for AAN	Relevance
PX5695	PHN Advisory Board Meeting Summary	Hearsay within hearsay;Relevance
PX5696	Attendee List	Relevance
PX5697	Presentation_Treating the Migraine Patient: An Internist's Perspective by Redonda Miller	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5698	Presentation Slides_Neurontin vs. Lyrica	Relevance
PX5699	Email sent from Alisaar Tubolino_re: Neurontin + Opioids	Relevance
PX5700	Internet Article_Gabapentin as an Adjuvant to Opioid Analgesia for Neuropathic Cancer Pain	Hearsay within hearsay;Relevance
PX5701	Michael Fagan's Entire Custodial File	Authenticity;Hearsay;Hearsay within hearsay
PX5702	A Double-blind Placebo-controlled trial of Gabapentin for treatment of Painful diabetic peripheral neuropathy	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5703	Protocol Template	Hearsay within hearsay;Relevance
PX5704	Neurontin Indication Discussion Slides	Foundation;Hearsay within hearsay
PX5705	Neuropathic Pain Advisory Board Meeting_General Session Summary	Hearsay within hearsay;Relevance
PX5706	3/29/2004 Memo From Suzanne Doft	Relevance
PX5707	Neurontin Educational Slide Kit	Hearsay within hearsay;Relevance
PX5708	Backonja, M. et. Al. Gabapentin for the Symptomatic Treatment of Painful Neuropathy in Patients with Diabetes Mellitus. JAMA 1998; 280(21): 1831-1836.	Hearsay;Hearsay within hearsay;Relevance
PX5709	Gibbons' Neurontin Study Proposal 2008	Hearsay within hearsay;Relevance;Relevance: New Warning
PX5710	Notes from 2008 Harvard Presentation of Robert Gibbons	No Objection
PX5711	PFE Neurontin Back-up Slides	Hearsay within hearsay;Relevance;Relevance: New Warning

Exhibit Number	Document Description	Defendants' Objections
PX5712	Email sent from Kevin Phelan_re: BD Section on AED Usage	Hearsay within hearsay;Relevance
PX5713	Email sent to Christopher Wohlberg from Ed Whalen_re: update	Relevance;Relevance: New Warning
PX5714	Clinical Protocol Synopsis_Protocol Number A0081047	Hearsay within hearsay;Relevance
PX5715	Research Report 720-03495	No Objection
PX5716	Neurontin Product Monograph	No Objection
PX5717	Broadening the Neuropathic Pain Algorithm Invitation 12/7/98	Relevance
PX5718	12/1/98 Press Release	Hearsay within hearsay;Relevance
PX5719	12/3/98 Fax from K. Lewis to Laura Johnson	Hearsay within hearsay;Relevance;Relevance: Marketing
PX5720	12/8/97 Memo From Vic Delimata	Hearsay within hearsay;Relevance
PX5721	3/14/95 Meeting Minutes	Hearsay within hearsay;Relevance;Relevance: Foreign Labels
PX5722	3/22/96 Meeting Participant List	Relevance
PX5723	7/12/95 Letter from Frary to Rizzo	Hearsay;Relevance
PX5724	letter from Tracy Frary (Miguara Kaplan Assoc) to J Rizzo (P-D) re: topline assessment of the results of the Quantitative Evaluation of the Opportunity for Neurontin	Hearsay;Hearsay within hearsay;Relevance
PX5725	P-D Portfolio Management Dinners	Relevance
PX5726	9/18/95 Memo From Griffin to Ulrich	Relevance
PX5727	8/6/97 Letter from Johnson to Dobson	Relevance
PX5728	3/4/96 Memo from Johnson to Krukar	Relevance;Relevance: Marketing
PX5729	Neurontin Advocates	Relevance
PX5730	PD Post Investigators Meeting 945-211	Hearsay within hearsay;Relevance
PX5731	Epilepsy Disease Speakers Bureau	Relevance
PX5732	Neurontin Marketing Assessment in Psychiatric Disorders	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5733	5/19/95 Neurontin Marketing Assessment Psych Disorders	Hearsay within hearsay;Irrelevant;Irrelevant: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX5747	USA vs. Warner-Lambert Company LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea
PX5748	Judgement for USA vs. Warner-Lambert Company LLC	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance: Plea
PX5749	Pfizer Global Research and Development Memorandum: A capsule history of the alpha-2-delta story	Relevance
PX5750	PPT: The Q3 alpha-2-delta Ligand Project	No Objection
PX5752	Email (January 16, 2003) from John Marino_subj: National Public Radio- Neurontin Story to be aired Tonight	Hearsay within hearsay;Probative Value Outweighed
PX5753	Chart: GABA Elevation Does Not Predict Mechanism of Action or Effects	Authenticity;Hearsay
PX5754	Fax of Depression Study Results	No Objection
PX5760	Pfizer Meeting Agenda	Relevance
PX5761	Faculty Statement of Financial Interests and Affiliations	Hearsay;Relevance
PX5762	Parke-Davis Research Report No: RR 995-00070	Hearsay;Relevance
PX5763	Letter from David Murphy re: Pain Disease State Management Proposal from Key Opinion Leader	Hearsay;Hearsay within hearsay;Relevance
PX5764	Invitation to dinner program: Broadening the Neuropathic Pain Treatment Algorithm	Hearsay within hearsay;Relevance
PX5765	Neurontin Publication Planning and Execution	Hearsay;Hearsay within hearsay;Relevance
PX5766	Curriculum Vitae of Edgar L. Ross	Hearsay;Relevance
PX5767	Parke-Davis Medical Research Protocol for Clinical Research Trial	Hearsay;Hearsay within hearsay;Relevance
PX5768	Memorandum re: Updated Speaker Lists	Hearsay;Hearsay within hearsay;Relevance
PX5769	MAP-PM 2002 Advisory Board Meeting Agenda	Hearsay within hearsay;Relevance
PX5770	Article:Neuropathic Pain: The Evolving Role of Anticonvulsants in Pain Management	Hearsay;Hearsay within hearsay;Relevance
PX5771	PPT NeuroBehavioral Working Group	Hearsay; Hearsay within hearsay; Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5772	The Evolving Role of Anticonvulsants in Pain Management by Edgar L. Ross	Hearsay;Hearsay within hearsay;Relevance
PX5773	Letter from David Murphy re: Pain Disease State Management Proposal from Key Opinion Leader	Hearsay; Hearsay within hearsay; Relevance
PX5774	Letter sent from E. Ross to Marilyn Abel re: Pain Programs in July	Hearsay;Hearsay within hearsay;Relevance
PX5775	Neurontin Update	Hearsay;Hearsay within hearsay;Relevance
PX5776	Letter sent from Marilyn Abel to E. Ross re: Re your checks	Hearsay;Hearsay within hearsay;Relevance
PX5777	Narrative Review: The Promotion of Gabapentin: An Analysis of Internal Industry Documents	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: Marketing
PX5778	Letter from James Rouhandeh to Susan Hanson-Philbrick	Hearsay;Hearsay within hearsay
PX5779	PHN Advisory Board Meeting	Relevance
PX5780	Attendee List	Relevance
PX5781	Communications Action Plan re:FDA Review of Labelling	Relevance;Relevance: New Warning
PX5782	Pfizer Response To FDA Alert on Suicidality	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5783	AED Executive Committee Presentation	Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5784	AED EC Update	Hearsay within hearsay;Irrelevant: New Warning;Probative Value Outweighed;Relevance;Relevance: New Warning
PX5785	ELT Update	Hearsay within hearsay;Probative Value Outweighed;Relevance;Relevance: New Warning
PX5786	Minutes of Lyrica/Neurontin Product Meeting	Probative Value Outweighed;Relevance
PX5787	Study Protocol	Relevance: New Warning
PX5788	Statistical Issues in Drug Safety: The curious case of anti-depressants, anti-epilepsy drugs?? And suicide	No Objection

Exhibit Number	Document Description	Defendants' Objections
PX5789	PowerPoint Presentation: Suicidality and Anti-Epileptic Drugs	Hearsay within hearsay;Relevance
PX5790	PhRMA Suicidality White Paper	Hearsay;Hearsay within hearsay;Probative Value Outweighed;Relevance
PX5791	Chart of Gabapentin Reporting Rates	Foundation;Probative Value Outweighed;Relevance;Rule of Completeness
PX5792	Presentation to Pharmacovigilance Working Party	Probative Value Outweighed;Relevance
PX5793	AED Advisory Committee Communications Plan	Probative Value Outweighed;Relevance
PX5794	Email from Phelan to Hakkinen	Relevance;Rule of Completeness
PX5795	Email from Whalen to Wohlberg Re: update	Probative Value Outweighed;Relevance
PX5796	Email From Romano to Phelan ReL Update on Israel MOH request	Probative Value Outweighed;Relevance;Relevance: Foreign Labels
PX5797	Email from Scheer to Wohlberg Re: Russ Portenoy	Hearsay within hearsay;Relevance
PX5798	Email from Knapp to Wohlberg Rel FDA Alert	Hearsay; Probative Value Outweighed; Relevance
PX5799	Email from Barrett to Wohlberg	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5800	Email from Wohlberg to Rodriguez Re:Social phobia	Hearsay;Hearsay within hearsay; Probative Value Outweighed; Relevance
PX5801	Email from Wohlberg to Bykoriz Re; Postmarketing Reports	Relevance
PX5802	Memo from Eng to Suicidality Assessment Work Group	Relevance
PX5803	Email from Whlberg to Bijlani ReL FYI AC Members	Hearsay within hearsay; Probative Value Outweighed;Relevance
PX5804	Email from Wohlberg to French Re: Suicidality and AED meeting.	Probative Value Outweighed; Relevance
PX5805	Email from Wohlberg to Cox Re: Lyrica	Probative Value Outweighed; Relevance
PX5806	Suicidality and Anti-Epileptic Drugs Agenda	Probative Value Outweighed;Relevance
PX5807	Faculty	Probative Value Outweighed; Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5808	Minutes from the March 23-24, 2009 Suicidality Consensus Conference	Foundation; Hearsay; Relevance
PX5809	Email from Wohlberg to Brandicourt re: FDA teleconference	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5810	PhVWP Review of AEDs	Hearsay; Probative Value Outweighed; Relevance
PX5811	Letter from Bartley to Gonzales: Response to Outstanding Questions	Probative Value Outweighed; Relevance; Relevance: Foreign Labels
PX5812	Antiepileptics and suicide-related PTs/SMQs FDA FOI AERS Q4 2007 Non clinical trial cases	Probative Value Outweighed; Relevance
PX5813	Reporting Rate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance
PX5814	Report Rate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance
PX5815	Reporting Reate For Suicide Chart	Foundation; Probative Value Outweighed; Relevance
PX5816	Reporting Rate For Suicide	Foundation; Probative Value Outweighed; Relevance
PX5817	Dear Investigator Letter	Probative Value Outweighed; Relevance
PX5818	Email from Garofalo to Knapp re: Safety Alert	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5819	Presentation to Combined Advisory Committee	Probative Value Outweighed; Relevance
PX5820	email from Cox to Wohlberg Re: Slide 8	Hearsay; Probative Value Outweighed; Relevance
PX5821	Email from Chappell to Wohlberg re: AED and FDA	Probative Value Outweighed; Relevance
PX5822	Email from Zeiher to Wohlberg re: Feedback Appreciated	Probative Value Outweighed; Relevance
PX5823	Email from Schwizer to Wohlberg Re: Neurontin Project	Probative Value Outweighed; Relevance; Rule of Completeness
PX5824	Email from Whalen to Gooch	Probative Value Outweighed; Relevance; Relevance: Foreign Labels
PX5825	Email from Feltner to Wohlberg re: Jackie French suicidality methods study	Probative Value Outweighed; Relevance

Exhibit Number	Document Description	Defendants' Objections
PX5826	Email from Wohlberg to Knapp Re: Jackie French suicidality methods study	Probative Value Outweighed; Relevance
PX5827	email from Richardson to Wohlberg Rel AED EC Agenda	Hearsay; Probative Value Outweighed; Relevance; Relevance: New Warning
PX5828	Strategic Risk Management Plan	Probative Value Outweighed; Relevance
PX5829	Email from Wohlberg to Garcia: ReL So I'm having trouble going to sleep	Hearsay within hearsay; Probative Value Outweighed; Relevance
PX5830	Lyrica/AED Class Labeling Media Statement	Probative Value Outweighed; Relevance;Relevance: New Warning
PX5831	Communications Action Plan re:Fda Alert	Probative Value Outweighed; Relevance
PX5832	Email from Roman to Wohlberg re: WSJ Blog	Hearsay; Probative Value Outweighed;Relevance
PX5833	Email from Cox re: Summary of AED Media Coverage	Probative Value Outweighed; Relevance;Relevance: New Warning
PX5834	Pfizer Product Training-Lyrica	Probative Value Outweighed; Relevance
PX5835	Gabapentin RMC Meeting	Probative Value Outweighed; Relevance
PX5836	Email from Kremer to Glue re: Assessment of Suicidality	Foundation;Probative Value Outweighed; Relevance
PX5837	Regulatory Update for AED Executive Committee Meeting	Probative Value Outweighed; Relevance; Relevance: Foreign Labels;Relevance: New Warning
PX5838	Email from Stampp to DL-Lyrica re : 2005 Lyrica GPP	Probative Value Outweighed; Relevance
PX5839	Lyrica 2005 Global Product Plan	Probative Value Outweighed; Relevance
PX5840	CIOMS-I Report	Hearsay;Probative Value Outweighed; Relevance
PX5841	Lyrica Clinical Trial Evaluation	Hearsay;Probative Value Outweighed; Relevance
PX5842	Lyrica Additional Clinical Trials	Probative Value Outweighed; Relevance;Relevance: Foreign Labels;Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX5843	Post-Marketing Gabapentin Cumulative Review of Suicidality	Hearsay; Probative Value Outweighed; Relevance; Relevance: Foreign Labels
PX5844	AED AC BOP Scenarios	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5845	McNamara Email Re: ROC	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5846	FDA ANALYSIS ON ANTIEPILEPTIC DRUGS AND RISK OF SUICIDALITY	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5847	Medication Guide	Probative Value Outweighed; Relevance; Relevance: New Warning
PX5848	Email from McKinnell re: Fourth quarter and Full Year 2000 Financial Results	Hearsay; Hearsay within hearsay; Probative Value Outweighed; Relevance
PX5849	Neurontin Studies/ JAMA Video News Release	Hearsay; hearsay within hearsay; relevance
PX5850	MAC Communications Neurontin Powerpoint Dated 10/21/2002	Authenticity; Relevance; probative Value Outweighed
PX5851	Article: The Effect of Gabapentin on Brain Gamma-aminobutyric Acid in Patients with Epilepsy	Hearsay
PX5852	Article: Gabapentin raises human brain GABA within thirty minutes	Hearsay Document Not Produced
PX5853	Review and Evaluation of Clinical Data re: Neurontin	Hearsay Document Not Produced
PX5854	Settlement Agreement	Relevance: Plea; Probative Value Outweighed
PX5855	Neurontin Mid-POA1 February 3, 2004	Probative Value Outweighed; Relevance: Marketing
PX5856	Neurontin 2003 Strategic Planning Meeting	Probative Value Outweighed; Relevance
PX5857	Neurontin 2001 US Operating Plan October 11, 2000	Hearsay within hearsay; Probative Value Outweighed; Relevance: Marketing

Exhibit Number	Document Description	Defendants' Objections
PX5858	Email sent from John Marino October 16, 2001 re: Gabapentin Neuropathic Pain Indication	Hearsay within hearsay
PX5859	Handwritten Notes re: Meeting with Leslie and Paula P.	Foundation; Hearsay; Relevance
PX5860	Gabapentin Presentation	Hearsay
PX5861	Precision Marketing Fax to Edda Guerrero from Lawton Griffin 8/21/1995 re: AED report on the STEPS Physicians	Hearsay within hearsay; Relevance
PX5862	Parke-Davis Memo to John Marino 7/24/2000 re: Neurontin Market Research: Rheumatologists and Orthopedists who prescribe Neurontin	Probative Value Outweighed; Relevance: Marketing
PX5863	1998 Strategic Plan and A&P Allocation Grid for Neurontin	Probative Value Outweighed; Relevance; Relevance: Marketing
PX5864	SE-CBU Neurontin 2000 A&P Budget	Foundation; Probative Value Outweighed; Relevance: Marketing
PX5865	Boron-Lepore Neurontin Conferences_132 MDs with ME#s, Events held in Oct 97	Foundation; Probative Value Outweighed; Relevance: Marketing
PX5866	Parke-Davis Email with attachments sent to Field Sales Colleagues from Epilepsy Disease Team re: AEDs Early Adopters	Probative Value Outweighed; Relevance: Marketing
PX5867	Neurontin Presentation	Authenticity; Hearsay; Probative Value Outweighed; Relevance: Marketing
PX5868	Parke-Davis Neurontin Promotional Analyses Presentation_March 13, 1995	Probative Value Outweighed; Relevance: Marketing
PX5869	Antiepileptic drugs and risk of suicide: a nationwide study. Olesen et al. Pharmaceutical and Drug Safety 2010.	Hearsay; Hearsay within hearsay; Untimely for expert reliance
PX5870	Anticonvulsant Medications and the Risk of Suicide, Attempted Suicide, or Violent Death. Patorno et al. JAMA 303:14 1401	Hearsay; Hearsay within hearsay; Untimely for expert reliance
PX6000	Slide from Defense Opening in Shearer v. Pfizer	No Objection

Dated: April 27, 2010

Respectfully submitted,

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